Category **Fire**

Letter Number *1 - Curlew DEIS* Comment ID 2

Comment: Thinning sagebrush with fire or 2,4-D is nearly impossible and mosaic patterns with fire are unpredictable. Fire also has ignition and control problems and the associated smoke is a larger threat to human health than herbicides. (See Regional risk assessment for vegetation management).

Response: All treatments using prescribed fire are intended to reduce sagebrush canopy cover to 0-5%. Thinning treatments would employ the use of herbicides, such as tebuthiuron, or mechanical methods that are designed specifically to reduce or thin sagebrush plants relative to the amount applied. The effects from smoke produced from prescribed fire treatments is addressed in the FEIS Additional smoke analysis (PM2.5) has been included in the FEIS and will be adressed in detail by a subsequent site-specific analysis.

In the selected alternative (Alternative H) there are no proposed treatments to thin sagebrush using prescribed fire or 2,4-D. The emphasis in this alternative is to maintain the existing percent of acres in each sagebrush canopy cover class. Treatments to thin sagebrush would likely employ tebuthiuron, or possibly mechanical methods, as determined to be appropriate by a subsequent site-specific analysis. Areas proposed for prescribed fire are those where fire is th first step of treatments designed to remove bulbous bluegrass from the understory to improve biodiversity, and to enhance sage grouse habitat in the long-term. The Grassland Plan allows prescribed fire on a limited basis to maintain existing canopy cover classes, if necessary.

Category **Vegetation**

Letter Number *1 - Curlew DEIS* Comment ID 1

Comment: About 90-100% of the dominate vegetation cover is sagebrush and there are also noxious weed and bulbous bluegrass problems. Technology now exists to this areas where sagebrush density is too thick to create desired density or mosaic patterns using Spike 20P herbicide. Spike herbicide treatments are lighter on the land than fire, because it does not create large areas of bare ground. The point I make is to allow your resource managers the use of tools and modern technology that currently exists. The use of herbicides is entirely essential as one of the Integrated Pest Management tools in the management of noxious weeds.

Response: Alternatives C, E, F, G and the selected alternative (Altnerative H) allow the use of herbicides for the purpose of reducing sagebrush canopy. See Chapter 2 of the FEIS for a full explanation of types of proposed treatments and acres to be treated in each alternative description. (JL)

State law requires that noxious weeds (those on a list approved by the State legislature) are to be treated by the land owner. Herbicides are one tool available for the treatment of noxious weeds, and they are used as appropriate when the situation calls for it. However, sagebrush is not a noxious weed, nor is bulbous bluegrass. Spike has been used previously to thin sagebrush and its use has been proposed in Alternatives C (2,500 acres), E (7,000 acres), F (9,600 acres), and G (2,500 acres) and H (9,600). When using Spike, or any herbicide to thin sagebrush, a suitable and desirable understory must be present for release. Bulbous bluegrass is not considered to be desirable for either wildlife habitat or livestock grazing, although it is a good ground cover for watershed protection. Therefore, the alternatives do not propose using herbicide treatments for thinning sagebrush when bulbous bluegrass is likely to dominate the understory after treatment.

A recent treatment of bulbous bluegrass by the Bureau of Land Management using Spike, showed that bulbous bluegrass could be eliminated without harming the native vegetation. This use for Spike is not addressed by the label instructions, but we are very interested in investigating the opportunity to use it. We are working with the BLM to learn more about the results of their treatments with Spike. If it is determined to be an effective, legal treatment, it would be considered for use in the appropriate situations.

Category **Alternative G**

Letter Number *10 - Curlew DEIS* Comment ID 204

Comment: However, dictating to private land owners what they should do or fencing both sides of all these streams is not in the best public interest. Let's understand that all of these drainages on the Curlew NG, except Rock Creek that flows into Stone Reservoir, are intermittent at best and none contain fish habitat. Reducing or removing grazing from these questionable "riparian" drainages is ill conceived or unacceptable.

Response: The Forest cannot dictate what private land owners do on their own lands. All proposed Goals, Objectives, Standards and Guidelines pertain ONLY to the Forest Service administered Grassland. The Forest is required to protect the resources of the lands it manages. The lack of salmonid fisheries does not reduce the Forest's responsibility to protect the watershed, riparian and aquatic resources and values within the Grassland. Of all the activities that occur within the Grassland, grazing has the greatest overall impact on the resources. In order to reduce overall impacts and provide for the needs of other resources, specific grazing standards and guidelines have been proposed. Creating riparian pastures and fencing other riparian areas should be effective in accomplishing the goals identified in the Draft Plan.

Category **Comment Noted**

Letter Number *10 - Curlew DEIS* Comment ID 205

Comment: Improving vegetative cover conditions for sage and sharp tail grouse has been a high priority on these lands for the last 40 years. Many tax payer and private dollars have gone into attempting to develop optimum sage and grass cover for nesting and chick rearing. "In case anyone cares, aerial or ground rig spraying ceased 30 years." Brush beating, chaining, seed harvesting, seeding, plowing, and burning are some of the methods used since 1970. Of the many efforts and money expanded in treatments, the Idaho Fish and Game personnel didn't like any of them.

Response: Thank you for your comment. It is important to know that resources were drastically altered prior to acquisition of this area by the government. Overall, long-term trends have been upward, as shown in the EIS. Resource conditions are based on the current and past management and are depicted in the Affected Environment chapter of the EIS. In the FEIS we have provided more information on past range improvement practices and the results thereof.

Also, it should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water and air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Letter Number *10 - Curlew DEIS* Comment ID 203

Comment: The watershed conditions that's causing most of the concerns in both Rock Creek, North Canyon, Meadow Creek and Deep Creek occurred prior to 1940 when all Curlew area now managed by the Forest Service and Bureau of Land Management was in a plowed agricultural state. Even though some of these drainages still have deep gullies, they have vastly improved through seeding, fencing, and cattle management. Introduced and native grasses, sedges and willows are stabilizing the banks. Periodic cloud bursts push rocks, dirt and debris from the intermingled farmed private lands down these channels. This continues to retard the healing.

Response: Thank you for your comment. Your information is displayed in the EIS.

Letter Number *10 - Curlew DEIS* Comment ID 209

Comment: Unless overall resource management direction of the National Forest system lands does not come in line with the Multiple Uses Sustained Yield Act, removing all the livestock will surely place the 100 new Forest Service employees Chief Dombeck recently ordered to manage these and other "special" lands.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. An alternative which would have created a Preserve was considered but then eliminated from further analysis.

Generally the decision maker chooses the alternative which best meets the Purpose and Need, which in this Plan, includes managing for multiple use. The Record of Decision discloses and explains the reasoning behind his choice of alternatives and how the chosen alternative provides for multiple uses.

Category **Livestock grazing**

Letter Number *10 - Curlew DEIS* Comment ID 206

Comment: Your proposed action sets out a litany of measurement goals for sage brush management. It appears that the goals described are another means to further reduce grazing by treating 2,500 acres or less each year with methods that may be acceptable to the Idaho Fish and Game. Making these 47,500 acres a "show place" for sage grouse restoration is not realistic or attainable. Removing all the cattle will still not allow sage grouse to prosper in the valley if the Idaho Fish and Game does not assume responsibility for some of their own wildlife species.

Response: The Curlew Grasslands Plan is basically a vegetation management plan, using both vegetation treatments and livestock grazing to achieve a variety of resource objectives. The alternatives propose a range of vegetation treatments designed to move vegetation toward a properly functioning condition. The rate at which these objectives are met vary by alternative based on the treatments and livestock utilization levels proposed in each alternative. The types of treatment also vary among the alternatives, with varying effects on sagebrush canopy cover and understory diversity. Only one alternative (D) removes livestock from the Curlew. None of the alternatives propose to make the Curlew a "show place" for sage grouse restoration. Habitats on the Grasslands have been modified by past activities and some treatments proposed would improve overstory and understory vegetative conditions for sage grouse.

Sagegrouse and habitat management are significant issues on the CNG. Some alternatives favor sage grouse more than livestock, while other alternatives favor livestock more than sage grouse.

Generally poor nest success from predation has been related to poor nesting habitat and predation has not been identified as a major limiting factor for sage grouse (Connelly et al 2001). Predator control programs are expensive and often ineffective over the long term but may be an option where there are small, isolated populations that are declining or where seasonal habitats are in good condition but their extend is limited (Connelly et al 2001).

Alternative H was developed to treat sagebrush with herbicides which would not require a reduction in grazing before or after treatment. Further, one of the goals of Alternative H is to maintain livestock grazing at or near current levels.

Category **Vegetation**

Letter Number *10 - Curlew DEIS* Comment ID 208

Comment: Your proposal to convert 4,000 to 6,000 acres of bulbous bluegrass to a more desirable species is good. But to treat only 5,000 and 9,000 acres of vegetation over a period of ten years is a disaster in the making. The bottom line here is that livestock forage species will diminish to a point when using only 45 to 50% of the forage will enforce elimination of more than 50% of the grazing season of use or numbers permitted.

Response: The treatment process we have found successful for getting rid of bulbous bluegrass requires taking a pasture out of grazing for about five years. Therefore, we can only treat a couple of pastures per association (there are two grazing associations on the Grassland) in a 10-year period without significant impacts to the permittees. For long-term benefits, the permittees will have to make some short-term sacrifices. Our estimates indicate that only Alternatives C, D, F, G and H would require possible reductions from current permitted numbers. However, these are only rough estimates and site-specific analysis would be required to establish changes in permitted grazing numbers and seasons.

Category **Wildlife**

Letter Number *10 - Curlew DEIS* Comment ID 207

Comment: It seems odd that you've designated Sweeten Pond a special wildlife area. That was done 20 years ago. Rather than pump water into the pond the last few years you've chosen to build more fences to keep cattle out of intermittent streams. The initial cost of developing Sweeten Pond area with it's electric water pump was well over $100,000. Let's take care of of the existing wildlife developments.

Response: In the spring, the ponds fill up with runoff. A spring, which flows into the pond system, doesn't flow when the rancher to the north is irrigating. As summer progresses, the upper pond dries up but the lower pond keeps some water. Waterfowl successfully use these ponds to bring off broods.

This site was developed and a well installed to carry water throughout the summer. However, it costs about $1,500/year to pump the water, and limited money has been available for the last few years. Because the pond system is still usable during the waterfowl nesting season, it was decided that this was a lower priority than some of the other needs on the District. Water hasn't been pumped into Sweeten Ponds for the last 4 years.

In Alternative H, the selected alternative in the Record of Decision, better management of the Sweeten Pond Wildlife Area is emphasized. Rather than building an additional pond at the complex, this alternative focuses on maintaining and improving existing facilities, including water pumping, as your comment suggests.

Category **Alternatives**

Letter Number *11 - Curlew DEIS* Comment ID 195

Comment: We have put approximately 20 miles of water lines, troughs, dug a well on the Hess-Haws field and maintained a second well on the Bull Pasture. With the help of the Forest and permit holders there were tree rows put in for habitat for birds and other wildlife. The tree rows didn't amount to much because of rabbits and drought conditions. I understand that the Buist Fields are in better shape than ever (except for the drought conditions created over the past few years With a substantial amount of moisture there will be plenty of feed for all the cows and excellent habitat for the birds.

Response: Comment noted. We appreciate the working relationship that exists between Grassland permittees and the Forest Service. These improvements have contributed to the upward vegetation trends on the CNG. Cooperation in the future will insure the continued success of CNG grazing.

Category **Economics**

Letter Number *11 - Curlew DEIS* Comment ID 197

Comment: The fact that 55% of Oneida County's economy comes from cattle and none from birds needs to be taken into consideration.

Response: No data were provided to support the statement that "55% of the Oneida County economy comes from cattle". However, we agree that the Agriculture sector of the County, including its sub-sectors related to cattle production, is a very important contributor to Oneida County. This is described in the DEIS and FEIS, Chapter 3, Affected Environment, Economics section. It is also a significant contributor to and support for the rural cultural and social values that are prevalent ir Oneida County.

The County income and employment data disclose that most agricultural income and labor related economic activity are associated with private farmland or lands under BLM management, rather than that occurring on the Grassland, which makes up only a small portion of the Oneida County land base.

When the Curlew Grassland is viewed in the context of its contribution to the overall Oneida County economy, its importance is most felt at the level of those permittees who directly run cattle on the CNG. The direct and indirect economic influence of cattle production related to the CNG on Oneida County is difficult to tease out of the much larger land base under BLM management and in private ownership. Because the CNG does not dominate the County land base, and therefore its economic activity, its contribution to the County economy appears to be less significant than its importance to the direct users of the Grassland, such as grazing permittees.

The economic value associated with game bird hunting, sight-seeing, bird watching, and other recreational values are included in the Economic Impact Analysis disclosed in FEIS, Chapter 4, Economics effects section. The analysis reveals that there is economic activity related to recreational use of the Grassland related to the birds. This comes from direct receipts from hunting tags, and indirect and induced incomes and employment from local demand for services, lodging, food, fuels by hunters and recreationists. There is also an important contribution from cattle and other agricultural sectors that are disclosed in the Economic effects section of the FEIS.

Category **Livestock grazing**

Letter Number *11 - Curlew DEIS* Comment ID 194

Comment: I feel this reduction of cattle on the Buist Fields is unnecessary. I can remember when my dad, Bud Davis, ran cows on the Buist Fields in the 1950's and there was no shortage of feed for his or the other permit holder's cows. Since that time there have been 2,000 acres burned and re-seeded (which you are already aware of) that as a result has increased feed for the cows and habitat for birds.

Response: Thank you for your comment. The EIS evaluates a full range of alternatives with various livestock utilization levels and discloses the economic impacts by alternative.

Alternative H, the Selected Alternative in the Record of Decision, was developed in response to your comments. This alternative would maintain grazing at or near current levels and treat sagebrush to maintain the existing acerages in each of the sagebrush canopy cover classes ove the Plan period.

Letter Number *11 - Curlew DEIS* Comment ID 198

Comment: I believe that cattlemen and everyone concerned can prosper and benefit if we work together. E reseeding more fields to grass, but leaving enough sage brush for birds, there will be no questior about not having enough feed for cattle and there will be no requirement to reduce cattle permits. Also, by reducing the predators the bird population will increase. You will also find many birds nesting in grain fields and neighboring CRP fields.

Response: We agree that cooperation among all interests and stakeholders is crucial to achieving community and economic goals and to achieving healthy environmental conditions for the Curlew Valley ecosystem. The EIS discloses the analysis of eight management proposals for the federally managed portion of the Curlew National Grassland. Some of these proposals maintain or increase the potential for livestock grazing, while others may reduce livestock grazing opportunities in order to better address other resources and uses, such as water quality, ripariar condition, or wildlife needs.

Alternative E in the EIS proposes to treat more than 17,000 acres of sagebrush using prescribed fire and other methods to reduce sagebrush canopy cover and increase understory production b reseeding treated areas with native and non-native forage producing species, primarily to benefit livestock grazing. However, this alternative does not meet the needs for improved water quality and wildlife habitat to the degree that several of the other alternatives do.

In selecting an alternative for implementation, the Forest Service considered which alternative would best resolve all of the issues while maintaining a balance of multiple uses. Alternative H, the Selected Alternative, was developed in response to public comments on the Draft EIS. This alternative features adaptive management and focused monitoring activities. In order to maintain the existing acres in each of the sagebrush canopy cover classes over time, approximately 12,100 acres of sagebrush would be treated over the plan period (10 years) using a combination of light and heavy herbicide applications or mechanical methods to thin sagebrush canopy cover. These treatments would occur first in areas where sagebrush canopy cover is greater than 25 percent. This alternative would treat more dense sagebrush which would improve understory production while maintaining brood-rearing habitat. Livestock use levels will be implemented on a site-specific basis to respond to various resource objectives, including wildlife needs.

Predator control is outside the scope of this analysis and falls under the jurisdiction of the USDA-APHIS-Wildlife Services.

Category **Wildlife**

Letter Number *11 - Curlew DEIS* Comment ID 196

Comment: I was at the last meeting in Malad when Frank Gunnell told you that he had documented records of the grass and the bird population, which are in higher numbers than at any other time.

Response: Additional information on sage grouse population trends has been included in the FEIS (See Chapter 3, Wildlife Habitat Management section and Appendix I, Sage Grouse Population Trends.)

Under current law the Idaho Fish & Game Department is responsible for managing huntable wildlife populations while the Forest Service is responsible for maintaining adequate quantity and quality of habitat, in cooperation with State Fish & Game, to meet huntable population objectives. Historically, the Forest Service has relied on population numbers provided by State Fish and Game surveys and monitoring efforts. Population numbers are estimates and while these estimates may not reflect the actual numbers of birds, some reasonable predictions can be made on the trends of a given population.

In reviewing IDFG monitoring information on sage grouse lek attendance, data indicate that based on mean number of male sage grouse per lek, when looking at the long-term trend over 20-30 years, sage grouse populations are on a downward trend over the Greater Curlew Valley Area. Because the CNG comprises only 9% of the GCVA and is broken into 3 distinct units, it is difficult to look at population trends on just the CNG. FS District lek attendance data and field observations suggest that while the mean number of males per lek has declined, the overall number of leks has increased.

Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

Category **Alternative G**

Letter Number *12 - Curlew DEIS* Comment ID 89

Comment: In addition, the proposed fencing of all riparian areas is not cost effective and will not benefit the grouse or watershed conditions enough to justify the effort. One major thunderstorm on adjacen farmlands will destroy fences and be a waste of time and money. This will create hazards to wildlife, livestock and humans. This has been demonstrated many times over the years and is why the Rocky Mountain Elk Foundation has contributed financing to assist in removing old wire on the Curlew Grassland. The current practice of riparian pasture management has been demonstrated to be a much more practical, productive and beneficial way to manage the riparian habitat.

Response: The majority of the stream channels and associated riparian areas within the Grassland are functioning-at-risk to non-functioning (see DEIS Tables 3-19 and 3-20). In order to improve these areas, two management strategies have been proposed (see DEIS page 4-135). About 50% of the required fences are already in place. The construction and maintenance of fence car be costly, but these strategies should be effective in protecting and restoring riparian and aquatic resources within the Grassland. RLL

The selected alternative fences only streams that are considered to be "at risk" that would benefi from corridor fencing will be fenced, approximatley five miles. All other perennial streams would be fenced into riparian pastures using existing fences where feasible. Grazing utilization levels i riparian pastures would be established based on the PFC condition of the stream. (CP)

Category **Alternatives**

Letter Number *12 - Curlew DEIS* Comment ID 91

Comment: This type of land management has been defined in a prescription developed by Dr. Alma Winward, Regional Ecologist, U.S. Forest Service. This has been done on several areas of the Curlew Grassland with the result being a productive habitat for sage grouse, sharp-tailed grouse and maintenance of existing animal unit months for livestock.

Response: Alternative A is the No Action alternative that would continue current management as it currently is on the Grassland. This alternative is a required alternative under the National Environmental Policy Act (NEPA) and was evaluated in the EIS. Because of sage grouse, riparian and other issues, Alternative G was selected as the preferred alternative in the Draft EIS.

Based on public comments on the Draft EIS and Draft Plan, a new alternative, Alternative H, was developed. This alternative emphasizes adaptive management and focused monitoring. It is the selected alternative in the Record of Decision. The alternative maintains existing sagebrush canopy cover over the ten-year plan period using a combination of light and heavy herbicide applications or mechanical methods. Vegetation treatments will be prioritized in areas of the Grassland where sagebrush canopy cover exceeds 25 percent.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the DEIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Category **Comment Noted**

Letter Number *12 - Curlew DEIS* Comment ID 95

Comment: Why responsible stewards of the land desire to change management direction, lose many years of investments and improvements, and revert to a less healthy environment, raises questions as to the motives and credibility of the current land managers.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed, including the current management. The decision maker based his decision on the effects analysis and explains his reasonings in the Record of Decision.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Category **Laws & Regulations**

Letter Number *12 - Curlew DEIS* Comment ID 92

Comment: At the same time, it [past management] has fully met the requirement and direction of the Bankhead Jones Act, which dictates the management and purpose of the Curlew National Grassland (a win, win situation for all the interests involved).

Response: While the Preamble of the Act states that the primary purpose is to "secure occupancy of farms and farm homes," it is not an operative part of the Statute and does not preempt the direction found in the body of the legislation. Furthermore, the Curlew NG is assisting in securing occupancy of farms by providing low-cost forage for the members of the Curlew and Buist Grazing Associations.

All of the alternatives meet the intent of the BJFTA, especially if we consider the remarks of Congressman Jones, chief sponsor of the Act for the House. He noted that "these lands may be used for any public purpose such as parks, game preserves, recreational centers, forest reserves, or for any other public purpose." Thus, even Alternative D, which eliminates livestock grazing on the CNG, would meet the intent of the BJFTA.

Title 3, Section 31 of the Bankhead Jones Farm Tenant Act states, "The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impariment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare, but not to build industrial parks or establish private or commercial enterprises."

Titles I, II and IV were repealed by Congress by the Agricultural Act of 1961. P.L.. 87-128. Title III, though not repealed, has been amended several times since 1937. In the 1960's, the Secretary of Agriculture issued three administrative orders involving the National Grasslands. The 1963 Order was perhaps the most significant since this order amended the management direction in the preceeding two orders. Section 213.1 of the 1963 Order in part states, "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use and to promote the development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas where the National Grasslands are a part."

The most significant Act affecting the National Grasslands, since the passage of the Bankhead-Jones Farm Tenant Act of 1937, was the enactment of the National Forest Management Act (NFMA) in 1976. Among other things, the Act requires the preparation of management plans for all units of the National Forest System of which National Grasslands are a part. In the early days the focus of National grasslands was on the value of stabilized watersheds, the productive use of forage by livestock and the relationships of both to rural community stability. Since then, many other values have been added - oil, gas, uranium, and coal; open space vistas; cultural resources; recreation opportunities; wildlife habitat; enjoyment of native plants; threatened and endangered plant and animal species; outdoor laboratories; and solitude.

Category **Livestock grazing**

Letter Number *12 - Curlew DEIS* Comment ID 90

Comment: The unacceptable and disheartening situation is this: The current management direction have been developed over many years of studies, research and practices. It has produced a healthy environment for the wildlife, livestock and productivity of the ecosystem. With the assistance of scientists (Dr. Alma Winward, Perry Plummer, and others), agency, and industry and livestock specialists, it has been demonstrated, vegetative treatments that rotate the sagebrush areas over a 30-year cycle will result in the most productive and beneficial condition for the entire ecosystem (soil, plants, and animals). There is a proven and demonstrated need to rotate the age, succession, and juxtaposition of the vegetative communities in order to maintain a diverse and healthy environment.

Response: While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Alternative A is the No Action alternative that would keep management direction as it currently is on the Grassland and was evaluated in the EIS. Because of sage grouse, riparian and other issues, other alternatives were developed to evaluate various approaches and management to address these issues.

Alternative A, the No Action alternative, would continue current management direction that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

Alternative H, the selected alternative in the Record of Decision, was developed in response to public comments on the Draft EIS. One of the goals of this alternative is to maintain livestock grazing at or near current levels. Another goal is to treat 12,100 acres of sagebrush using light to heavy herbicide applications or mechanical methods to thin sagebrush canopy cover. These treatments will be prioritized in areas that currently support sagebrush in greater than 25 percent canopy cover.

Category **Vegetation**

Letter Number *12 - Curlew DEIS* Comment ID 93

Comment: The abandonment of the current management direction to treat between one and 2,000 acres of sagebrush per year will result in less productive habitat for sage grouse, sharp-tailed grouse and livestock. In addition, a significant fire hazard will be created for larger and more severe wildfires to occur.

Response: Alternatives A and E propose to treat between 1,000 and 2,000 acres a year using a variety of treatment methods, including prescribed burns and herbicide treatments. The effects of these alternatives on wildlife and livestock grazing are described in Chapter 4 of the FEIS.

The selected alternative (Alternative H) maintains the existing percentage of acres in each sagebrush canopy cover class. In order to achieve this goal over the ten-year plan period, approximately 9,600 acres would be treated using herbicides or mechanical methods. Prescribed fire is allowed on a limited basis to achieve this goal, if necessary. Monitoring in Chapter 5 of the Grassland Plan has been expanded. Information from monitoring activities should provide better information regarding the effects of management on wildlife species and habitat as well as production capacity on the Grassland.

All wildland fires on the Grassland will be aggressively suppressed under all alternatives. Since 1985 approximately 1,000 acres of sagebrush have burned, either by wildfire or through prescribed fire treatments. The potential for larger, more intense wildfires increases as the amount of sagebrush with dense canopy cover increases. The wildland fire hazard was one of the many factors considered in choosing among alternatives for managing the Grassland.

Category **Wildlife**

Letter Number *12 - Curlew DEIS* Comment ID 88

Comment: The proposed management alternative will convert 71 percent of the area to old growth sagebrush. This will result in a significant negative effect upon most of the wildlife species, especially the sage grouse and sharp-tailed grouse, and the livestock and watershed resources.

Response: We are not managing for "old growth" sagebrush, but rather for a distribution of sagebrush canopy cover classes. The Sage Grouse Guidelines (Connelly, et al, 2000) are the most recent, peer-reviewed set of recommendations for management of sage grouse habitat. These guidelines emphasize the importance of sagebrush stands in 15-25% canopy cover for nesting habitat, and 10-30% canopy cover for winter habitat.

As discussed in the EIS in Chapter 3, Wildlife Habitat Management section, sharp-tailed grouse are habitat generalists and adapt to many different habitats. Sage grouse depend on sagebrush habitats for much of the year. Effects on both of these species are detailed in Chapter 4 of the EIS.

The effects of the alternatives on understory vegetation and watershed condition are disclosed i Chapter 4 of the EIS.

Alternative H, the selected alternative in the Record of Decision, proposes to maintain sagebrush canopy cover in existing canopy cover classes over the ten-year Plan period. Vegetation treatments will focus on treating areas of the Grassland that are in greater than 25 percent canopy cover, using a combination of herbicide applications and mechanical treatments. This alternative features adaptive management strategies with focused monitoring to help us better understand the impact of uses and management actions on the Grassland.

Letter Number *12 - Curlew DEIS* Comment ID 94

Comment: I have observed the fluctuations and trends in sage grouse and sharp-tailed grouse populations since 1966. There are currently significant larger populations of both species with wider distribution than there were in the 1960's and 1970's (Data on file in Malad Ranger District Office). The wildlife and livestock habitat conditions have improved over the years because of the vegetative treatments, water developments, tree row plantings, and riparian pastures. Why any responsible land manager interested in a healthy grassland would want to change this is beyond any scientific or common sense.

Response: In reviewing IDFG monitoring information on sage grouse lek attendance, data indicate that based on mean number of male sage grouse per lek, when looking at the long-term trend over 20-30 years, sage grouse populations are on a downward trend over the Greater Curlew Valley Area. Because the CNG comprises only 9% of the GCVA and is broken into 3 distinct units, it is difficult to look at population trends on just the CNG. FS District lek attendance data and field observations suggest that while the mean number of males per lek has declined, the overall number of leks has increased.

Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

The final EIS includes additional information on sage grouse population trends in Chapter 3 and in Appendix I. Also refer to the Biological Evaluation and Biological Assessment in Appendix J.

Category **Alternatives**

Letter Number *13 - Curlew DEIS* Comment ID 87

Comment: I advocate that management efforts, which should be primarily the treatment of sagebrush to revert it to earlier succession stages, be intensified upon the Grassland. Otherwise, both sage and sharp-tailed grouse, as well as other desirable wildlife species will be adversely affected.

Response: All alternatives except Alternative D propose a variety of treatments that would maintain sagebrush communities in various stages of succession. Alternatives were analyzed that provid treatment levels similar to your suggestion. Alternative A would treat 1,875 acres annually, and the effects this alternative would have on wildlife species are described in the Wildlife Habitat Management section under the Alternative A discussion in Chapter 4 of the EIS.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

Category **Laws & Regulations**

Letter Number *13 - Curlew DEIS* Comment ID 80

Comment: If the Grassland was permitted to revert primarily to old-growth sagebrush and if livestock grazin was excluded, the Forest Service would not be honoring the mandate under which the Grasslan was established. IF the Grassland is not managed primarily to demonstrate "grassland agriculture" (I.e., livestock grazing), the mandate upon which the Grassland was established would be negated. In short, the Forest Service would be acting contrary to the Bankhead-Jones Act or the laws under which the Grassland originally was established.

Response: Title 3, Section 31 of the Bankhead Jones Farm Tenant Act states, "The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impariment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare, but not to build industrial parks or establish private or commercial enterprises."

Titles I, II and IV were repealed by Congress by the Agricultural Act of 1961. P.L.. 87-128. Title III, though not repealed, has been amended several times since 1937. In the 1960's, the Secretary of Agriculture issued three administrative orders involving the National Grasslands. The 1963 Order was perhaps the most significant since this order amended the management direction in the preceeding two orders. Section 213.1 of the 1963 Order in part states, "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use and to promote the development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas where the National Grasslands are a part."

The most significant Act affecting the National Grasslands, since the passage of the Bankhead-Jones Farm Tenant Act of 1937, was the enactment of the National Forest Management Act (NFMA) in 1976. Among other things, the Act requires the preparation of management plans for all units of the National Forest System of which National Grasslands are a part. In the early days the focus of National Grasslands was on the value of stabilized watersheds, the productive use of forage by livestock and the relationships of both to rural community stability. Since then, many other values have been added - oil, gas, uranium, and coal; open space vistas; cultural resources; recreation opportunities; wildlife habitat; enjoyment of native plants; threatened and endangered plant and animal species; outdoor laboratories; and solitude.

All of the alternatives meet the intent of the BJFTA, especially if we consider the remarks of Congressman Jones, chief sponsor of the Act for the House. He noted that "these lands may be used for any public purpose such as parks, game preserves, recreational centers, forest reserves, or for any other public purpose." Thus, even Alternative D, which eliminates livestock grazing on the CNG, would meet the intent of the BJFTA.

Category **Vegetation**

Letter Number *13 - Curlew DEIS* Comment ID 81

Comment: It may appear or some people may believe the natural or historical habitat upon the Curlew National Grassland is or was comprised of old-growth sagebrush plant communities. This is not the case. Historically, this area supported primarily grassland disclimax plant communities. And, the Grassland probably never supported extensive stands of old-growth sagebrush.

Response: Literature suggests that sagebrush ecosytems evolved with a natural fire return interval of 20 to 40 years (Barrett, 1994; Houston, 1973; and Winward,1991). Other literature and monitoring data suggests that succession takes approximately 20 to 40 years for big sagebrush stands on the Grassland to grow from 0-5% canopy cover to greater the 15% canopy cover. (Winward, 1991; Blaisdell, et al, 1982). Some areas on the Grassland that are in 0-5% sagebrush canopy cover will not move to 6 to 15% sagebrush canopy because of ecological conditions. However, approximately 95% of the Grassland is successional to sagebrush.

Letter Number *13 - Curlew DEIS* Comment ID 86

Comment: A basic ecological principle is: "Diversity tends toward stability." In other words, if the desire for the Curlew National grassland is to maintain relatively high and stable sage grouse populations, as well as of other desirable wildlife species (I.e., sharp-tailed grouse, mourning doves, cottontai rabbits, etc) management efforts should be directed towards maintaining a diversity of plant communities and their succession stages.

…even to maintain a desirable mix of succession sagebrush communities, an average of at least 2,000 acres should be treated or reverted back to early plant succession each year. Efforts alsc should be devoted to developing and maintaining seeps and meadow areas, as well as to the planting of a variety of plant species, especially palatable forbs. Likewise, shrub and tree-row plantings should be maintained and expanded.

Response: All alternative except alternative D propose a variety of treatments that would maintain sagebrush communities in various stages of succession. Although Alternative H is the selected alternative, other alternatives were analyzed that provide treatment levels similar to your suggestion. Alternative A would treat 1,875 acres annually and the effects this alternative would have on wildlife species is described in Chapter 4 of the FEIS.

Category **Wildlife**

Letter Number *13 - Curlew DEIS* Comment ID 84

Comment: Even during winter…it has been my observation that sage grouse rarely enter dense, tall stands of sagebrush - in which they have difficulty taking flight and perhaps in avoiding predators. The Strawberry Reservoir area once supported the best sage grouse populations in Utah… instead c benefiting sage grouse, a reversion to essentially old-growth sagebrush habitats in this area resulted in a marked demise in sage grouse numbers.

Response: Sage grouse select winter-use sites based on snow depth and topography, and snow can affec the amount of sagebrush available. The Guidelines (Connelly, et al, 2000) recommend maintenance of sagebrush stands with canopy cover of 10-30% and heights of at least 25-35 cm regardless of snow cover.

Effects on potential sage grouse winter habitats are discussed in Chapter 4, by alternative, unde section Sage Grouse, Guideline 4. Currently about 59% of the sagebrush is in the canopy cover >15% category. Two alternatives would result in a decrease; five alternatives would result in an increase and one alternative would remain about the same.

Letter Number *13 - Curlew DEIS* Comment ID 83

Comment: The periodic treatment of sagebrush and efforts to maintain the Curlew National grassland in primarily a grassland habitat has greatly enhanced sharp-tailed grouse populations in this area. Shrub and tree row plantings on the Grassland also have helped expand and maintain sharp-tailed grouse populations in the area. However, permitting the Grassland to revert primarily to climax sagebrush communities would adversely affect the sharp-tailed grouse.

Response: As discussed in the EIS in Chapter 3, sharp-tailed grouse are habitat generalists and adapt to many different habitats. Sharp-tail grouse populations in southeast Idaho are up partly due to the Conservation Reserve Program. Sage grouse depend on sagebrush habitats for much of the year. And sage grouse populations show a downward trend over the Greater Curlew Valley Area. Effects on both of these species are detailed in Chapter 4 of the EIS.

Alternative H, the selected alternative in the Record of Decision, proposes to maintain the existing sagebrush canopy cover over the ten-year Plan period using a combination of light and heavy herbicide applications or mechanical methods. Treatments would be prioritized in areas of the Grassland that are currently in greater than 25 percent canopy cover. This alternative features adaptive strategies and focused monitoring that can help us better understand how management actions interrelate with the needs of a variety of wildlife species the Grassland supports.

Letter Number *13 - Curlew DEIS* Comment ID 85

Comment: …on the Vernon Division of the Wasatch National Forest … sage grouse almost invariably were found to use the relatively few areas which had recently received treatment. Sage grouse apparently used these areas because they produced an abundance of forbs, as compared to adjacent old-growth sagebrush communities.

In short, instead of enhancing sage grouse populations, permitting the Curlew National Grassland to revert to old-growth sagebrush will result in adverse effects upon sage grouse, as well as upon sharp-tailed grouse.

Response: We are not managing for "old growth" sagebrush, but rather for a distribution of canopy cover classes. The Sage Grouse Guidelines (Connelly, et al, 2000) are the most recent peer-reviewed set of recommendations for sage grouse habitat management. These guidelines emphasize the importance of sagebrush stands in 15-25% canopy cover for nesting habitat and 10-30% canopy cover for winter habitat.

Alternative H, the selected alternative in the Record of Decision, proposes to maintain the existing sagebrush canopy cover classes using a combination of light to heavy herbicide applications or mechanical methods. Treatments will first occur in areas of the Grassland where sage brush canopy cover is in greater than 25 percent. In addition, this alternative features adaptive strategies for livestock grazing that would result in meeting residual vegetation growth needs on a portion of the Grassland each year. For example, areas of the Grassland that are important for sage grouse nesting and brood-rearing would be grazed lighter than other areas. Areas that have primarily crested wheatgrass in the understory could be grazed heavier to maintain the plant's vigor. Grazing patterns would most likely be rotated over time,

Alternative H also features focused monitoring activities, such as annual utilization monitoring on key areas, as well as annual utilization mapping.

Letter Number *13 - Curlew DEIS* Comment ID 82

Comment: Based on fire scars on woody vegetation, George Gruell, a wildlife biologist who spent much of his career studying fire ecology, claims virtually the entire Grassland historically probably burned at least once every 7 years. This maintained the Grassland in a fire disclimax and probably never let much, if any, of the area revert to old-growth sagebrush - except on rocky knolls or ridges, where there was not enough vegetation fuel to carry a fire.

In short, the natural and historical habitat for the Grassland was grass and forb plant communities - not old-growth sagebrush. Furthermore, these grassland communities supported good populations of both sage and sharp-tailed grouse.

Response: Our data indicates 95-98% of the Grassland potential natural vegetation as sagebrush and mountain brush, and that these communities experienced a historic fire return interval of 20 to 40 years (See Chapter 3 of EIS). If you have research by Gruell conducted on the Curlew National Grassland that identifes a mean fire return interval of 7 years that maintained the area in grassland vegetation, we would be very interested in seeing it and discussing it with you. It is unlikely that sage grouse populations could be sustained in such a grassland ecosystem -- sage grouse rely upon sagebrush communities with a variety of seral stages for various portions of their life history.

Category **Comment Noted**

Letter Number *14 - Curlew DEIS* Comment ID 190

Comment: Alternative A which is already in place, is a much better one, and it is my preference. It has beer in place for a number of years, and it has worked well. According to USFS studies and retired Forest Service personnel, the range has continually improved each year. It looks much better today than it did in the past. The sage grouse numbers are remaining stable. The ranchers are continually striving to improve the range and to maintain and construct watering facilities for cattle and wildlife. They are trying to promote the multiple-use concept where everyone can wor together to enjoy the environment and beauty of the grasslands.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Letter Number *14 - Curlew DEIS* Comment ID 193

Comment: Thank you for taking the time to read my comments. I feel they are based on common sense and not of biased opinions.

Response: Thank you for your comment. The Interdisciplinary Team will "review, analyze, evaluate, and respond to substantive comments on the draft EIS", as specified in the Forest Service Environmental Policy and Procedures Handbook (FSH 1909.15, 24.1) and the NEPA itself (40 CFR 1502).

Letter Number *14 - Curlew DEIS* Comment ID 192

Comment: I would like the Forest Service to take a good look at Alternative A. Why change something that is already in place and working good?

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. Generally the decision maker chooses the alternative which best meets the Purpose and Need. The Record of Decision discloses and explains the reasoning behind his choice of alternatives.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Letter Number *14 - Curlew DEIS* Comment ID 187

Comment: Your plan is a basis for wildlife and sage grouse. It is a very biased opinion that is discriminatory to stockmen. The only people involved in this document are the National Wildlife Federation, the Fish and Game, and the USFS. There was absolutely no input from ranchers or cattlemen.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.Generally the decision maker chooses the alternative which best meets the Purpose and Need. The Record of Decision will disclose and explain the reasoning behind his choice of alternatives.

Sage grouse habitat is one of the significant issues and according to NEPA, we must develop alternatives to address those issues. In addition, the NFMA requires that we maintain viability for wildlife species. Since sage grouse numbers west-wide are declining, the Forest must insure its management is not contributing to a loss of viability.

The public involvement plan for the Curlew National Grassland Amendment included an outreach to the public, interested stakeholders, state, local, and federal partners. Chapter 6 in the EIS details the public involvement process and contains a list of public contacts. Comments received on the Draft EIS and Draft Plan are disclosed in Appendix M. The project record contains all of the letters received from the public regarding the management proposals contained in the EIS, how public comments were used to identify issues and concerns, and how those issues and concerns drove the design and development of the alternatives. Many local ranchers and residents made comments on the Draft EIS. These comments, along with other comments from the groups you cite, were used to create Alternative H, the selected alternative in the Record of Decision.

Letter Number *14 - Curlew DEIS* Comment ID 188

Comment: The Preferred Alternative, which is alternative G, is stacked against the cattle producers. It is designed to remove cattle from the grasslands. The emphasis is placed on sage grouse and not on the livelihood of cattlemen. It consists primarily of a lot of sagebrush and a lot of fencing.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. The rationale for his decision will be clearly displayed in the Record of Decision.

Sage grouse habitat is one of the significant issues and according to NEPA, we must develop alternatives to address those issues. In addition, the NFMA requires that we maintain viability for wildlife species. Since sage grouse numbers west-wide are declining, the Forest must insure its management is not contributing to a loss of viability.

Alternative H, the selected alternative in the Record of Decision, was developed, in part, from public comments on the Draft EIS. Alternative H is a combination of components from Alternative F and G. It allows adaptable livestock grazing where areas that are important for sage grouse nest and brood-rearing would be grazed lighter and areas that are dominated by crested wheatgrass would be grazed heavier. It reduces riprian corridor fencing to approximate five miles on streams that will benefit the most from this kind of management action.

Category **Livestock grazing**

Letter Number *14 - Curlew DEIS* Comment ID 191

Comment: Why try to destroy the stockman's image, which is part of the West, for the sake of birds which, when properly managed, can work well the way things are.

Response: The EIS evaluates a full range of alternatives, all of which provide for a variety of proposed livestock utilization levels and grazing standards and guidelines. Some alternatives may result in more significant effects (reduction of livestock numbers) than other alternatives. These effects have been dislcosed in the EIS under the "Livestock Grazing" and "Economic and Social" sections in Chapter 4.

In selecting an alternative for implementation, the Forest Service considered which alternative would best resolve all of the issues while maintaining a balance of multiple uses. Alternative H, the Selected Alternative, was developed in response to public comments on the Draft EIS. This alternative features adaptive management and focused monitoring activities. In order to maintain the existing acres in each of the sagebrush canopy cover classes over time, approximately 12,100 acres of sagebrush would be treated over the plan period (10 years) using a combination of light and heavy herbicide applications or mechanical methods to thin sagebrush canopy cover. These treatments would occur first in areas where sagebrush canopy cover is greater than 25 percent. This alternative would treat more dense sagebrush which would improve understory production while maintaining brood-rearing habitat. Livestock use levels will be implemented on a site-specific basis to respond to various resource objectives, including wildlife needs.

Letter Number *14 - Curlew DEIS* Comment ID 189

Comment: Who is going to construct and maintain all of these fences? When it falls down, who is going to clean up the mess?

Response: There are several ways fences on the CNG will be funded, receipts from grazing fees and using appropriated funds are only two examples. Like the existing structural improvements, the maintenance of the fences will be the responsibility of the grazing permittees.

Alternative H, the selected alternative in the Record of Decision, reduces the amount of riparian corridor fencing to about five miles while putting the remaining perennial streams into riparian pastures, where they are not currently fenced, using existing fences where practical.

Category **Form letter**

Letter Number *15 - Curlew DEIS* Comment ID 330

Comment: Comments in this letter are the same comments as found in Letter #52, Please refer to letter #52 for comments and responses.

Response:

Category **Alternatives**

Letter Number *16 - Curlew DEIS* Comment ID 185

Comment: I would like to recommend that more emphasis be placed on hunters, predators, and recreationists, and not on forage and habitat.

Response: There are numerous factors which may be contributing to the decline of sage grouse populations (See Chapter 3, Wildife Habitat Management). Hunting seasons and predator control are beyond the scope of this project and concerns about recreation effects on sage grouse are addressed through travel management (described in Chapter 4). Effects of recreationists viewing sage grouse on leks is addressed through incorporation of the sage grouse Guidelines (Connelly, et al, 2000) in population guideline #12.

The focus of the Curlew Grassland Plan is management of sagebrush habitats, both through livestock management and vegetation treatments. Sage grouse are an issue and a range of alternatives has been developed to address sage grouse habitats. All alternatives address sage grouse guidelines to varying degrees.

Under current law the Idaho Fish & Game Department is responsible for managing huntable wildlife populations while the Forest Service is responsible for maintaining adequate quantity and quality of habitat in cooperation with State Fish and Game to meet huntable population objectives. Historically, the Forest Service has relied on population numbers provided by State Fish and Game surveys and monitoring efforts.

Appendix I in the EIS contains a comprehensive review of sage grouse population trend information known at the time of this analysis. Also refer to the Biological Evaluation and Biological Assessment in Appendix J for more information.

Category **Comment Noted**

Letter Number *16 - Curlew DEIS* Comment ID 186

Comment: I would like the USFS to continue to let us help you promote the multiple-use concept without additional harassment such as too much fencing and too much sage brush. Livestock producers have all the work and expense that they need.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. The effects of the alternatives on livestock producers has been displayed in the EIS. The socioeconomic effects section has been revised in the FEIS to be more comprehensive.

Alternative H, the selected alternative in the Record of Decision, was developed, in part, to respond to public comments like yours. This alternative is a combination of Alternatives F and G. It proposes to maintain the existing sagebrush canopy cover using herbicides to thin canopy cover, particularly where the density is greater than 25 percent. It also reduces riparian corridor fencing to approximately five miles and focuses on streams that will benefit the most from this type of management action. Livestock utilization levels are flexible in that areas that are important for sage grouse nesting and brood-rearing will be grazed lighter and areas predominantly in crested wheatgrass will be grazed heavier.

Letter Number *16 - Curlew DEIS* Comment ID 184

Comment: The current management plan, Alternative A, has been in place for many years. It addresses grassland agriculture, forage management, wildlife, water, and recreation. The grasslands have continued to improve, and they are in much better shape today than they were in the past. Let us continue to be good stewards of the soil. Let us continue to exercise the multiple-use concept. Let the sage grouse continue to flourish on the land.

I see no need to ruin a good thing. Why do we address change when there isn't a need for it? I would like to recommend the continued use of Alternative A.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Letter Number *16 - Curlew DEIS* Comment ID 178

Comment: I tried to read your Environmental Impact Statement on the Curlew National Grasslands. I found a few pages that were interesting. The rest of it a college professor couldn't understand.

Response: Thank you for your comment. We regret that you did not find the EIS understandable. The Forest Service makes every effort to present technical information in a readable and understandable format. The wide array of audiences, including scientists and other resource agencies and professionals who review our environmental documents, make this a formidable task. Without more specific information on what sections you could not understand, we cannot remedy the situation.

Category **Economics**

Letter Number *16 - Curlew DEIS* Comment ID 181

Comment: [The DEIS] will have a severe economic effect on my income. It will also have a sever economic effect on Oneida County. It says it won't but it will.

Response: We agree that any alternative analyzed in detail in this FEIS, including No Action, could have a severe impact on any individual permittee's income or ranching operation. This is acknowledged in the FEIS. However, without actually analyzing individual livestock operations in detail, from a business, financial, or management perspective, it is not possible to predict or estimate the effects on a specific enterprise with any reliability. Such effects analysis at the individual operation level is outside the scope.

The purpose is to look at the economic effects of the various alternatives at the County level because the data are primarily available there. Even then, some data are sketchy because of the limited industrial diversity within the county and the small size of many businesses, which make some employers reluctant to report their business's income and employment data.

Given this, the results of the Economic Impact Analysis do not lead to the conclusion that the management changes proposed in the alternatives within this FEIS, in and of themselves, would trigger a "severe" economic impact on the County economy. The effects are described in the FEIS, Chapter 4, Economic effects section.

Other factors, or a combination of such, that could adversely impact economic resiliency in the County economy, would have to significantly, and unpredictably, change to create a "severe" impact cumulatively with the effects of any Plan alternative. Such future circumstances cannot be foreseen in this analysis. While this is possible, it is outside the scope of this analysis to portray a highly speculative "worse case scenario" of economic factors interacting with the Grassland plan alternatives which could severely impact the Oneida County economy. Although the FEIS effects section does acknowledge potential adverse cumulative risk, NEPA does not require such speculative scenarios.

Letter Number *16 - Curlew DEIS* Comment ID 183

Comment: Don't ruin our livelihood for the sake of a few birds that are doing fine they way it is.

Response: The economic effects of multiple uses on the Grassland are shown in the economic analysis in Chapter 4 for the FEIS, Economics section.

New issues and challenges, policy changes, and new state and federal laws and/or court cases compel us to consider a wide array of information, including public comments, in the development of a revised land and resource management plan. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive farmework with focused monitoring.

Category **Laws & Regulations**

Letter Number *16 - Curlew DEIS* Comment ID 182

Comment: The Bankhead Jones Act was put into place n the 1930's to be managed to demonstrate grassland agriculture. To allow it to revert back to old growth sage brush and sharply curtail cattle grazing, the Forest Service would be acting contrary to this Act.

Response: Title 3, Section 31 of the Bankhead Jones Farm Tenant Act states, "The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impariment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare, but not to build industrial parks or establish private or commercial enterprises."

Titles I, II and IV were repealed by Congress by the Agricultural Act of 1961. P.L.. 87-128. Title III, though not repealed, has been amended several times since 1937. In the 1960's, the Secretary of Agriculture issued three administrative orders involving the National Grasslands. The 1963 Order was perhaps the most significant since this order amended the management direction in the preceeding two orders. Section 213.1 of the 1963 Order in part states, "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use and to promote the development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas where the National Grasslands are a part."

The most significant Act affecting the National Grasslands, since the passage of the Bankhead-Jones Farm Tenant Act of 1937, was the enactment of the National Forest Management Act (NFMA) in 1976. Among other things, the Act requires the preparation of management plans for all units of the National Forest System of which National Grasslands are a part. In the early days the focus of National Grasslands was on the value of stabilized watersheds, the productive use of forage by livestock and the relationships of both to rural community stability. Since then, many other values have been added - oil, gas, uranium, and coal; open space vistas; cultural resources; recreation opportunities; wildlife habitat; enjoyment of native plants; threatened and endangered plant and animal species; outdoor laboratories; and solitude.

While the Preamble of the Act states that the primary purpose is to "secure occupancy of farms and farm homes," it is not an operative part of the Statute and does not preempt the direction found in the body of the legislation. Furthermore, the Curlew NG is assisting in securing occupancy of farms by providing low-cost forage for the members of the Curlew and Buist Grazing Associations.

All of the alternatives meet the intent of the BJFTA, especially if we consider the remarks of Congressman Jones, chief sponsor of the Act for the House. He noted that "these lands may be used for any public purpose such as parks, game preserves, recreational centers, forest reserves, or for any other public purpose." Thus, even Alternative D, which eliminates livestock grazing on the CNG, would meet the intent of the BJFTA.

Category **Livestock grazing**

Letter Number *16 - Curlew DEIS* Comment ID 180

Comment: [The DEIS] includes a lot of fencing that is not necessary. Proper management could eliminate most of it.

Response: Fencing, even though there is an up-front construction cost and a maintenance cost, should be an overall benefit to the livestock permittees within the Grassland. Without fencing, intensive monitoring and management of livestock is required to meet the stated goals of riparian areas and stay within utilization and disturbance standards. Intensive monitoring and management is still required within riparian pastures, and once standards are achieved, livestock are moved from the pasture. Monitoring and management workloads are essentially eliminated in those areas where riparian areas are excluded from grazing.

In selecting an alternative for implementation, the Forest Service considered which alternative would best resolve all of the issues while maintaining a balance of multiple uses. Alternative H, the Selected Alternative, was developed in response to public comments on the Draft EIS. This alternative features adaptive management and focused monitoring activities. Riparian corridor fencing has been reduced in this alternative to about five miles on streams that will benefit from this kind of fencing. Other perennial water will be fenced into riparian pastures, if they are not already in riparian pastures, using existing fences where practical.

Letter Number *16 - Curlew DEIS* Comment ID 179

Comment: [The DEIS] is primarily written in favor of sage grouse with very little concern for livestock producers.

Response: The EIS evaluates a full range of alternatives, some of which favor sage grouse management more than others.

National Environmental Policy Act (NEPA) requires that the Forest Service develop alternatives to address issues. Wildlife, sage grouse in particular, are a significant issues that we addressed in the alternatives. The National Forest Management Act (NFMA) also requires the Forest to maintain viability of plant and wildlife populations. Sage grouse population decline has been a national concern for the past several years. For these reasons, we must address and mitigate effects to sage grouse. Alternatives A and E emphasize the needs of livestock producers above the other issues. Alternative C manages the Curlew primarily for upland birds.

Alternative H, the selected alternative in the Record of Decision, was developed in response to comments on the Draft EIS. Alternative H combines elements of several of the alternatives in an adaptive alternative that features focused monitoring. This alternative is expected to maintain grazing at or near current levels; maintain older sagebrush wile improving the age and structural diversity of sagebrush Grassland-wide. It also provides for improvement in sage grouse nesting and brood-rearing habitat. Alternative H uses adaptive and flexible livestock grazing standards.

Category **Alternatives**

Letter Number *17 - Curlew DEIS* Comment ID 42

Comment: Western Watersheds Project has also recommended an immediate reduction by a minimum of 40% in the permitted numbers of livestock in order to address the extreme resource degradation and the extreme overstocking rates presently existing on the Curlew National Grassland.

Response: We do not agree with your characterization of the conditions on the Grassland as "extreme resource degradation." Quite the contrary, the Grassland appears to be on an upward trend (Se pictures in EIS in Chapters 3 and 4). It is unclear to us how you arrived at a 40 percent reduction in permitted numbers. We would be interested in seeing your data that would support such a reduction and the science it was based on.

Appendix G describes in detail the methods used to calculate a range of potential head months by alternative. Tables in the Livestock grazing section of Chapter 3 show existing average production per year on native, crested wheatgrass and bulbous bluegrass sites. The EIS clear ir that it states, "production figures do not represent absolute peak biomass production, nor do they account for additional fall growth. They do not represent absolute production values or the range of productivity for a given site due to climate or site-specific conditions. These data are not to be used for stocking rate determination without other supporting data and site-specific analysis. Another table in this section display a second calculation for estimated forage production under three sagebrush canopy cover classes. Here, the EIS also states that "it should be understood these calculations are very general and provide only estimates. Capacity and stocking levels may vary by allotment, based on site-specific conditions that are not reflected in the calculation. Computations of potential head months should not be used or extrapolated to establish stocking levels or capacity without site-specific analysis."

The Revised Grassland Plan does not establish livestock carrying capacity (I.e., season of use, grazing system or permitted livestock numbers.) The decisions on carrying capacity for each allotment will be based on followup allotment studies and inspections and will be based on actual utilization/stubble height levels. Livestock are removed when use levels have been met. In some years, that could be as high as 40 percent. On the Buist Association, for example, the livestock left over two weeks early. This amounted to a 20 percent reduction this year (Evans, personal comm. 2001).

Letter Number *17 - Curlew DEIS* Comment ID 45

Comment: With the exception of the livestock removal proposed in Alternative D, none of the current draft alternatives adequately address the serious overstocking of the Curlew National Grassland. None of the alternatives adequately address the needs of native wildlife (including upland game bird species) or native plant community components. Either a new resource-appropriate land management alternative needs to be drafted entirely or substantial modifications and revision need to be made to an existing alternative, such as to the Forest's preferred Alternative G.

Approximately 3,316 cow/calf pairs are currently permitted for the Curlew National Grassland. Estimates have been made that this stocking represents an overstocking rate or level of approximately 167% when compared to estimates of the available livestock AUMs.

Response: No source for the data in the comment was provided to substantiate the assertion on 167% overstocking on Curlew allotments. Without this information, we cannot address this further. According to our calculations, the CNG is not overstocked (See Appendix G). Furthermore, livestock are moved when use levels have been met, regardless of the theoretical "stocking rate."

The planning team evaluated alternatives that considered a range of utilization standards and vegetation treatment levels. The Alternatives did not propose any specific stocking level and do not establish stocking levels for the allotments. The effects analysis only provides estimates of the effects on grazing capacity in each alternative.

Several sections in the DEIS address and disclose the effects of livestock grazing, including "Vegetation Understory," "Wildlife Habitat Management," and "Livestock Grazing." Site-specific analysis will be completed during allotment management plan updates during the first three years of plan implementation. We believe this is a more appropriate decision level for determining grazing capacity, permitted use, season of grazing and other issues pertaining to individual grazing allotments.

Upon review of the findings documented in the FEIS, the Responsible Official determined that the direction in the selected alternative and Curlew Grassland Plan adequately addresses upland bird habitat and native plants. Restoration of bulbous bluegrass areas is an important step in recovering native and desirable non-natives plant species and improved upland bird habitat.

Letter Number *17 - Curlew DEIS* Comment ID 44

Comment: It is very apparent… that established standards and guidelines, strict monitoring procedures and accountability clauses must be incorporated into the management plan and any legitimate draft alternatives. Western Watersheds Project is deeply concerned by the past management failures within the Curlew National Grassland and is appalled by the severely degraded watershed, riparian, and wildlife habitat conditions. None of the currently proposed Forest Service draft alternatives adequately provide for the federally required responsible management of Curlew National Grassland resources …

Western Watersheds Project believes that none of the currently proposed draft alternatives properly address the needs of the Curlew National Grassland. All currently proposed draft alternatives would continue to further degrade the resources of the Curlew National Grassland o would provide inadequate mitigation for past resource abuses.

Current draft alternatives propose unacceptable utilization levels, and propose continued livestock utilization on lands already determined or likely to be determined as incapable of sustaining the proposed levels of livestock utilization. Appropriate standards and guidelines are lacking from all alternatives.

The proposed alternatives, with the exception of Alternative D (includes withdrawal of livestock) indicate the intention to allow livestock to continue to utilize 98% of the Curlew National Grassland. This intention is in direct conflict with determinations made by the Caribou National Forest. (See letter of itemized list from AMS.)

Response: We disagree that all of the proposed alternatives would continue to "further degrade" the resources of the CNG. Quite the contrary, trends on the Grassland have improved over time with better livestock grazing practices and wildlife improvements. The Grassland is a highly-altered landscape. It has been plowed many times and seeded to introduced native vegetation species on at least 66% of the acres. This is one of the factors that make the CNG a unique resource with unique management challenges.

Each of the alternatives responds to the significant public issues identified in this planning process and described in Chapter 1. Some alternatives provide more forage for livestock; others focus on retaining more residual vegetation and canopy cover for sagebrush obligate species. Other alternatives attempt to resolve issues by blending management options in a way that would meet habitat needs while allowing livestock grazing to continue. All of the alternatives must be responsive to state and federal laws.

All of the alternatives were analyzed in the EIS and their effects on the resources were displayed including the current management. The decision maker based his decision on the effects analysis and explains his reasonings in the Record of Decision.

While enforcement of utilization standards is vital to the successful implementation of the Curlew Grassland Plan, it is outside of the scope of this analysis. It is reasonable to assume that the permit administrators will properly administer the livestock grazing permits, including enforcing the livestock utilization standards. The present livestock management is displayed in Chapter 2, Alternative B and Chapter 3 of the EIS.

The EIS and project record contain an extensive description of current and historic vegetation data. In the FEIS the current vegetation and historic management activities have been further researched, documented, analyzed, and displayed.

Livestock carrying capacity displayed in the EIS is based on estimated forage production. The site specific analysis for Allotment Management Plan revisions would refine the capacity estimates. This process follows the livestock allotment management planning process described in Forest Service Handbook 2209.13, Chapter 90 and FSH 2209.21.

In addition, the grazing utilization standards in the Curlew Plan will be incorportated into the grazing agreements of the Curlew and Buist Grazing Associations. Even in the absence of revised Allotment Managmeent Plans the CNG will be managed according to the standards in this Plan. If the utilization level is reached before the grazing season is over, the livestock will be moved to the next unit or off the allotment. This is standard grazing permit administration as described in Part 2 of every FS grazing permit.

Letter Number *17 - Curlew DEIS* Comment ID 46

Comment: Alternative A or a continuation of the present management course would lead to further degradation of the Curlew National Grassland.

Response: The effects of Alternative A are disclosed in Chapter 4, Environmental Consequences. According to our information, overall trend on the CNG is upward.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

Letter Number *17 - Curlew DEIS* Comment ID 47

Comment: Alternative D could provide for restoration of the Curlew National Grassland's currently degraded resource values if revised to include appropriate measures and would obviously be of the greatest benefit to watershed, upland, riparian, wildlife, fisheries, and human recreational values

Response: We disagree with the commentor that the CNG is in a "degraded" condition. Our information indicates that overall trend on the Grassland is upward.

We are unclear what "appropriate measures" the commentor is referring to. Alternative D represents a "custodial level" of management. No livestock grazing or vegetation management would occur in this alternative.

The effects of all alternatives are disclosed in Chapter 4, Environmental Consequences section.

Letter Number *17 - Curlew DEIS* Comment ID 48

Comment: Implementation of such an Alternative (Alt E) would accelerate the levels of degradation already present within the allotment and could lead to extirpation of sagebrush obligates (such as the Sage Grouse and Columbian sharp-tailed Grouse) as well as other plant and wildlife species from the Curlew National Grassland (Saab et al 1995). Such impacts could lead to serious losses or elimination of remaining native shrub communities such as Bitterbrush or other associations valuable to wildlife - that can occur when species are subjected to severe levels of domestic livestock utilization (Hironaka, Fosberg, & Winward 1983). Institution of such an alternative would be in direct conflict with applicable federal (and state) laws and policies, as we as extremely environmentally irresponsible.

Response: The effects of Alternative E are disclosed in FEIS Chapter 4, Environmental Consequences. The effects also disclosed the degree to which management actions under Alternative E would affec Grassland species, habitats, and vegetation. Our analysis indicates that none of the alternatives would lead to extirpation of any sagebrush obligates.

Letter Number *17 - Curlew DEIS* Comment ID 49

Comment: While presenting a variety of possible management styles, not a single one of these alternatives seriously addresses the severe resource degradation rampant within the Curlew National Grassland directly attributable to the overstocking, over-utilization, and mismanagement of livestock on these lands administered by the Caribou National Forest… all alternatives imply the intent to excessively utilize "management prescriptions or treatments" to obtain allotment management goals or the vaguely defined "desired conditions" - rather than attempting to address the causes of current resource degradation: the ongoing unacceptable levels of livestock utilization.

Response: We disagree that severe resource degradation is rampant on the CNG. On the contrary, vegetation appears to be in an upward trend. The CNG is a highly altered landscape. More than 66% of the acres have been plowed many times and seeded to introduced vegetation species. This is one factor that makes the CNG unique with unique management challenges.

Alternative D displays the effects of no livestock grazing.

The effects analysis in FEIS, Chapter 4, disclose the effects of grazing under different untilizatior standards. The Selected Alternative and most other alternatives are expected to allow sustainable grazing opportunity and still provide adequate resource protection and recovery.

Category **Comment Noted**

Letter Number *17 - Curlew DEIS* Comment ID 171

Comment: The primary reason found for the unacceptable riparian conditions within the Curlew NG "is the Forest's failure to require even minimal riparian utilization standards for livestock grazing." A major contributing factor noted was 60% utilization of wheatgrass.

Response: The current management plan did not establish grazing standards or guidelines so it is unclear what standard the commentor refers to. While there are no utilization standards in the current Caribou LRMP, the Curlew and the Buist Allotment Management Plans have use standards of 60 percent. The permittees have been complying with these standards. In fact, a field review of many grazing pastures in 2001 showed that utilization averaged 50 percent. It should be noted that over the past three or four years, livestock permittees have established riparian pastures on approximately ten miles of the existing 24 miles of stream on the Grassland in an effort to improve riparian conditions. Riparian pastures are grazed once early in the grazing season and then allowed to rest. In addition, according to research literature, crested wheatgrass is a robus grass capable of withstanding higher utilization standards than most native vegetation.

It is also important to understand that resources were drastically altered prior to acquisition of this area by the government, and that most stream headwaters reside on private land. Many of the factors affecting riparian conditions are outside of the jurisdiction of the Forest Service. For example, the South Fork of Rock Creek is continuing to be downcut from high sediment loads coming off of private land during rain events. Without changes in the management of the private land in the headwaters, channel conditions on the Curlew portion will continue to degrade (see photographs in Curlew Project File). Overall, long-term trends of riparian areas have been upward as shown in the EIS. Resource conditions are based on current and past management and are depicted in the Affected Environment of the EIS. The IWF study information was used in this analysis and is cited in the EIS.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements. Other alternatives would improve conditions to greater or lesser degrees, as described in the effects analysis.

Letter Number *17 - Curlew DEIS* Comment ID 177

Comment: Draft alternatives must reflect Endangered Species Act Compliance. There should be indication in the draft alternatives of USFWS consultation, development of conservation strategies, identification of potential forage/denning habitat, and of other attempts to comply with the current Threatened status of Lynx Canadensis, or of any other endangered, petitioned, or species of special concern that is present, potential, or historic for the CNG.

Response: Please refer to the Wildlife section of the EIS for information on threatened, endangered, and sensitive species. Information on consultation with the USFWS is in the project file and referenced in the EIS in Appendix J. When the Curlew Amendment was scoped, the USFWS had no concerns regarding any listed or candidate species. Since there has been a change in personnel in the Eastern Idaho Field Office, we reconsulted. This information is included in the FEIS in Appendix J and in the Record of Decision.

As a result of a meeting on 9/5/2001 with the USFWS, Salmon-Challis, Beaverhead-Deerlodge, Caribou-Targhee and BLM from Idaho and Montana, the Caribou portion of the Forest was dropped as suitable lynx habitat. Montpelier and Soda Springs Ranger Districts have been identified as potential linkage habitat, while the West-side Ranger District is not considered linkage habitat. Lynx will not be considered further for the Curlew National Grasslands.

Letter Number *17 - Curlew DEIS* Comment ID 176

Comment: Draft alternatives should include evidence of NEPA compliance, and evidence of adherence to the National Forest Management Act and all other applicable policy or guidelines.

Response: This comment is extremely broad therefore we will respond to it in a broad manner. The EIS itself is evidence of compliance with NEPA's requirement to analyze the effects of our actions on the environment and to disclose those effects to the public. In addition, the NFMA, in part, requires that Forests and Grasslands be managed according to a broad set of Goals, Objectives, and Standards. This direction is to be assembled in a Plan. Each draft alternative is the skeleton of such a Plan. Adherence to other applicable policy and guidelines has been disclosed in Appendix A and is further displayed in the Record of Decision.

Letter Number *17 - Curlew DEIS* Comment ID 175

Comment: Language regarding "reductions in levels of use" are vague in all cases and show no evidence o addressing the overstocking rates that appear to be nearly 2.3 or more in excess of a reasonable carrying capacity (Idaho Wildlife Federation, 1998).

Response: We find no evidence that the current stocking rate is 2.3 times or more in excess of a reasonable carrying capacity. Stocking rates are outside the scope of this analysis.

This Grassland Plan is a programmatic guide to managing the Curlew National Grasslands. The site specific management of each allotment will be subject to additional analysis. Both levels of NEPA analysis are subject to the legal requirements of analysis and disclosure.

Grazing utilization standards in the programmatic Plan will be incorportated into the grazing agreements of the Curlew and Buist Grazing Associations. Even in the absence of revised AMPs, the CNG will be managed according to the standards in this Plan. If the utilization level is reached before the grazing season is over, the livestock will be moved to the next unit or off the allotment. This is standard grazing permit administration as described in Part 2 of every FS grazing permit.

Livestock carrying capacity displayed in the EIS is based on estimated forage production. The site-specific analysis for the AMP revisions would refine the capacity estimates. The livestock allotment management planning process is described in Forest Service Handbook 2209.13, Chapter 90 and FSH 2209.21. A separate public involvement process would be conducted in conjunction with AMP updates. We believe the site-specific level is the more appropriate decision level to determine carrying capacity, permitted numbers or other allotment management concerns, based on site-specific conditions, issues and concerns in each allotment.

Letter Number *17 - Curlew DEIS* Comment ID 174

Comment: The cost share project notes that the Caribou NF did not conduct required NEPA review or analysis prior to entering into the 1989 Curlew Grazing Agreement. The project conclusions further state that "renewal of the Curlew Grazing Agreement in 1999 without significantly changed grazing levels or grazing management will likely continue ecological degradation and resource harms. Excessive grazing and livestock mismanagement outside the carrying capacity of the land is also indicated by the Forest data in the AMP. Urgent management action is needed to protect riparian resources, water quality, fisheries habitat, sensitive species, and othe resource values of the CNG.

Response: At the time that the 1989 Curlew Grazing Agreement was signed, it was Forest Service policy that NEPA analysis was not required for an ongoing activity. In the early 1990's, this policy changed, and NEPA was required prior to reissuing permits. In 1995, the Rescission Act, Public Law 104-19, was passed which explicitly states that no NEPA analysis is required for reissuanc of a grazing permit. As a result of this law, the Forests were required to develop a 15-year schedule for analyzing the effects of grazing, if the NEPA was insufficient. For instance, in some areas new species had been listed or conditions had changed since the previous analysis. The Curlew and Buist AMPs will be revised after this analysis, using the guidance from the Curlew Plan.

In addition, grazing utilization standards in the programmatic Curlew Plan will be incorportated into the grazing agreements of the Curlew and Buist Grazing Associations immediately. Even in the absence of revised AMPs, the CNG will be managed according to the standards in this Plan. If the utilization level is reached before the grazing season is over, the livestock will be moved to the next unit or off the allotment. This is standard grazing permit administration as described in Part 2 of every FS grazing permit. The livestock allotment management planning process is described in Forest Service Handbook 2209.13, Chapter 90 and FSH 2209.21.

Letter Number *17 - Curlew DEIS* Comment ID 172

Comment: The cost-share study noted, "there is considerable and irrefutable documentation of sage grouse population decline. Columbian sharp-tail grouse are a state species of special concern and a nationally significant resource.

Response: The affected environment is, in part, a result of past and current management practices. The existing condition of Grassland resources is disclosed in Chapter 3 of the EIS, including sage and sharp-tailed grouse.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

Sage grouse habitat is one of the significant issues, and according to NEPA, we must develop alternatives to address this issue. In addition, the NFMA requires that we maintain viability for wildlife species. Since sage grouse numbers west-wide are declining, the Forest must insure its management is not contributing to a loss of viability. In that regard, each alternative was analyzed to determine if State sage grouse habitat guidelines would be met. Refer to Wildlife Habitat Management effects in Chapter 4 of the EIS.

Letter Number *17 - Curlew DEIS* Comment ID 169

Comment: Forest Service administration of the CNG incorporates excessive and abusive livestock grazing levels and practices which have destroyed or severely damaged riparian habitats.

Response: We respectfully disagree that the Forest Service incorporates excessive and abusive livestock grazing levels and practices. Other factors, including drought, adjacent land use, insects, disease, water diversions and other uses, such as recreation, also result in impacts to the landscape. Grazing capacity and permitted livestock numbers are determined at the site-specific level in allotment management plans. The "Livestock Grazing" section in Chapter 3 of the EIS discloses current allotment management.

It is important to understand that soil and vegetative resources were drastically altered prior to acquisition of the CNG by the government. Approximately 36,000 acres of the 47,000 acres of the Grassland under Forest Service administration have been plowed and seeded, in many cases more than once. Overall, long-term trends have been upward, as shown in the EIS. All alternatives maintain or improve upland and riparian habitats to varying degrees.

Letter Number *17 - Curlew DEIS* Comment ID 170

Comment: The conclusions of the IWF were supported by Hugh Harper, former BLM Director of Wildlife and a Denver Service Center Range Specialist. Mr. Harper toured the Grassland in 1994 and later reported, "The management there is gross - in fact I see no evidence of [range] management being applied."

Response: We do not agree with Mr. Harper's statement. The EIS and project record contain an extensive description of current and historic vegetation data. In the FEIS the current vegetation and historic management activities have been further researched, documented, analyzed, and displayed.

It is important to understand that resources were drastically altered prior to acquisition of this area by the government. Overall, long-term trends have been upward, as shown in the EIS.

Letter Number *17 - Curlew DEIS* Comment ID 60

Comment: The alternative most likely to lead to improved watershed, wildlife, fisheries, recreation and other values is Alternative D which includes complete withdrawal of livestock from the Curlew National Grassland. The alternative is incomplete and is not fully acceptable as currently proposed due to the past intensive alteration of native habitats and the severe level of degradation that now exist within the Curlew National Grassland.

Alternative D requires some revision for a number of serious issues including mitigation, such as replanting of woody riparian species and other management considerations in order to lead to the long-term desired results of improved watershed, wildlife, and native plant community values.

Response: See "Alternatives Considered but Dropped from Further Analysis" in Chapter 2 of the EIS. "Alternative X" proposed extensive restoration by converting existing conditions to native plants and animals reflective of pre-settlement conditions.

The Curlew Grassland came into Federal ownership and Forest Service administration in a seriously degraded condition. It was not a natural ecosystem and many of the traits of a highly modified landscape remain today. However, the condition of the Grassland is much improved over that found when the National Grassland was established, largely due to agency management and cooperation of livestock permittees and other users.

The purpose and need for the proposal is to amend existing and create new management direction for the vegetation, riparian, livestock grazing, wildlife, and other resources and uses on the Grassland based on a proposed range of future conditions. (Chapter 1, EIS). Each alternative responds to the proposed range of future conditions based on the rate of change to achieve those conditions. For example, some alternatives would achieve desired conditions sooner than other alternatives.

The intent of the plan and analysis is not to restore the CNG to native conditions; rather, it is to improve the diversity and condition of the vegetation, watersheds, and habitat, while providing traditional human uses on a sustainable basis.

Letter Number *17 - Curlew DEIS* Comment ID 168

Comment: Approval of the curlew AMP, subsequent permitting actions and gazing administration might be construed by the courts to be "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law in violation of the federal Administrative Procedure Act.

Response: This Grassland Plan is a programmatic guide to managing the Curlew National Grassland. The site-specific management of each allotment will be subject to additional analysis. Both levels of NEPA analysis are subject to the legal requirements of analysis and disclosure. Upon completion of these processes, the Forest could be challenged under the APA, as described in your comment. We believe, however, that these analyses will more than satisfy the requirements we are held to by the court.

Permitting actions and grazing administration are implementing actions and will be done according to the Forest Service regulations. These are outside of the scope of this analysis.

Letter Number *17 - Curlew DEIS* Comment ID 166

Comment: Riparian conditions observed in the IWF study indicate non-adherence with the Forest Plan Standard and Guideline. The team observed water quality degradation, soil erosion, and loss of soil productivity, disruption and elimination of native plant communities, loss of habitat for fish, birds, wildlife, destruction or progressive loss of habitat for numerous species (including species of concern) and degradation of aesthetic and recreational values.

Response: The current management plan did not establish grazing standards or guidelines so it is unclear what "Forest Plan Standard and Guideline" the commentor is referring to. The IWF study information was used in this analysis and is cited in the EIS.

It should be noted that over the past three or four years, livestock permittees have established riparian pastures on approximately ten miles of the existing 24 miles of stream on the Grassland in an effort to improve riparian conditions in these pastures. Management of riparian pastures include a short grazing period early in the grazing season, and then the pastures are rested.

Alternative H, the selected alternative in the Record of Decision, proposes to establish riparian exclosures on five miles of stream considered to be "at risk" of properly functioning condition to accelerate recovery to PFC. The remaining perennial streams that are not currently fenced into riparian pastures will be fenced using existing fences where practical. Livestock utilization levle in these riparian pastures will be based on the PFC status of the stream in each pasture.

Also, it is important to understand that resources were drastically altered prior to acquisition of this area by the government. Overall, long-term trends have been upward, as shown in the EIS. Resource conditions are based on current and past management and are depicted in Chapter 3, Affected Environment, in the EIS. It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water and air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements. Other alternatives would improve conditions to greater or lesser degrees, as described in the effects analysis.

Letter Number *17 - Curlew DEIS* Comment ID 165

Comment: Under the Forest Service rapid assessment process for watershed conditions Rock Creek, Buist and Deep Creek were classified with a disturbance vulnerability rating of 2- which means 20-50% of the watershed is comprised of sensitive lands; South Fork Rock Creek was classified with a disturbance vulnerability of 2 to 3- which means that more than 50% of the watershed is comprised of sensitive lands.

Response: Current conditions of these watersheds are detailed in Chapter 3 of the EIS. In addition several riparian PFC studies are summarized including those completed by the Forest Service, the BLM and the Idaho Wildlife Federation. These summaries are found in the Baseline Indicator Section of Chapter 3.

Letter Number *17 - Curlew DEIS* Comment ID 164

Comment: The lack of vegetative diversity, including a reduction of forb and grass composition, has resultec in serious degradation of wildlife habitat within the Curlew NG.

Response: The native understory had been modified before the CNG was acquired by the National Forest System. The purpose of many of the nonstructural range improvements, including the seeding of bulbous bluegrass and crested wheatgrass, was to stabilize the soils and reduce erosion. Since this stabilization effort, more emphasis has been placed on seeding with desired non-natives and re-establishing native species. Each of the alternatives addresses reseeding on treated sites with some alternatives requiring a "native only" seed mix and others allowing a combination of native and desired non-native seed mixes. As shown in the EIS, overall long-term upland vegetative trend has been upward since the Grassland was acquired in the 1950's.

Alternative H, the selected alternative in the Record of Decision, was developed, in part, to respond to public comments on the Draft EIS. It is a combination of features from several of the alternative in the Draft EIS. Atlernative H allows the use of native and non-native seed mixes in site-specific understory restoration projects based on project objectives. It is highly unlikely that restoration to native vegetation Grassland-wide will occur in the short-term. In fact, because the Grassland is a highly altered landscape, a return to native vegetation may be impossible. (See Chapter 3, Vegetation Understory section.)

Letter Number *17 - Curlew DEIS* Comment ID 163

Comment: Native understory vegetation has been drastically modified on all but 12,000 acres of the Grassland; a result of seeding with non-native grass species that dominate treated sites.

Response: The native understory had been modified before the CNG was acquired by the National Forest System. Approximately 36,000 acres have been plowed and seeded, in many cases more than once. Past management of the Grassland emphasized grassland agriculture that included seeding of bulbous bluegrass and crested wheatgrass to stabilize the soils and reduce erosion. Since this stabilization effort, more emphasis has been placed on reseeding treated sites with desired non-native species and encouraging native species to reestablish. Each of the alternatives addresses how treated sites will be revegetated, with some alternatives allowing bo native and desired non-native seed mixes, and other alternatives that require the use on a "native only" seed mix.

Alternative H, the selected alternative in the Record of Decision, allows for native and non-native seed mixes. All site-specific vegetation projects will address the regeneration method needed to meet resource objects of the project.

Letter Number *17 - Curlew DEIS* Comment ID 162

Comment: Livestock grazing practices have resulted in poor soil conditions within the Grassland particularly in riparian zones and other areas of livestock concentration.

Response: We agree that livestock grazing impacts vegetation condition, but other factors such as drought, adjacent land use, insects, disease, water diversions and other uses, such as recreation, also result in impacts. It is important to note that the CNG is a vastly altered ecosystem. About 36,000 acres of the 47,000 acres under Forest Service administration have been plowed and seeded, in some cases more than once. Overall, long-term trend has been upward since the area was acquired by the National Forest System in order to stabilize soils. The effects of current livestock management on soils and riparian areas are disclosed in Chapter 3 of the EIS.

Alternative H, the selected alternative in the Record of Decision, includes corridor fencing of streams (about five miles) that are assessed to be "at risk" of properly functioning condition in an effort to speed up recovery. All other riparian areas not currently in riparian pastures will be fenced into riparian pastures using existing fences where practical. Livestock utilization levels in riparian pastures will be determined based on the PFC status of the stream in that pasture. Once livestock utilization levels are met, the cows move to the next pasture or move off the Grassland.

Letter Number *17 - Curlew DEIS* Comment ID 173

Comment: CNG grazing was noted as likely violating the Clean Water Act, state water quality standards, and as exceeding agency plans and requirements.

Response: While livestock grazing can impact water quality, other factors such as adjacent land use, flash floods, or other natural and human-caused events can also affect water quality. The IWF riparian properly functioning condition assessment was used and referenced in the EIS along with subsequent riparian PFC assessments done by the Forest Service and BLM. While some of the findings in the IWF assessment were validated, the Forest Service did not agree with all of the conclusions in the IWF assessment, based on its own assessment of riparian PFC.

It will be incumbent upon private and public land managers to work in a cooperative way to meet Clean Water Act and state water quality requirements. It should be noted that most stream headwaters are located on private land outside of the Curlew National Grassland. This is certainly a unique situation in the National Forest System. Because of the juxtaposition of the Curlew National Grassland and the intermingled nature of land ownership patterns, a cooperative effort is the only way to achieve these goals.

Letter Number *17 - Curlew DEIS* Comment ID 23

Comment: It is abundantly clear that the current Forest Plan of 1985 was worked poorly in all respects, except to maximize grassland resources for livestock production.

Response: The needs for change in management on the Grassland are identified in the AMS and described in the purpose and need in Chapter 1 of the FEIS. The Selected Alternative in the Record of Decision is designed to address the shortcomings of the 1985 Forest Plan, continue those management actions that were effective, and improve direction to address public issues brought forward through the scoping and ppublic involvement process.

Letter Number *17 - Curlew DEIS* Comment ID 51

Comment: In addition, field observations made throughout southeastern Idaho during 1999 and 2000 indicate that vegetation manipulation through the use of prescribed fire, particularly across large acreages, is rarely successful in achieving either range or wildlife benefits due to the often complete lack of adequate rest periods following projects, as well as through a severe lack of livestock permittee cooperation as evidenced by multiple incidences of trespass within burned or "treated" areas on federal and state lands.

Response: The grassland Plan includes a standard that states, "Allow no livestock grazing before seed set of the second growing season after natural fires and rangeland planting or seeding."

Letter Number *17 - Curlew DEIS* Comment ID 167

Comment: The Forest has almost no historic or current data on upland conditions or livestock carrying capacities. Capacity data put forth in the 1982 AMP appears to be based on either non-existent data or on data which was erroneously massaged to justify permitted grazing practices.

Response: The EIS and project record contain an extensive description of current and historic vegetation data. In the FEIS the current vegetation and historic management activities have been further researched, documented, analyzed, and displayed.

Livestock carrying capacity displayed in the EIS is based on "estimated" forage production. The site-specific analysis for the AMP revisions would refine the capacity estimates in the Grassland Plan. The site-specific analysis follows the livestock allotment management planning process described in Forest Service Handbook 2209.13, Chapter 90 and FSH 2209.21.

In addition, the grazing utilization standards in the Plan will be incorportated into the grazing agreements of the Curlew and Buist Grazing Associations. Even in the absence of revised AMPs the CNG will be managed according to the standards in the Plan. If the utilization level is reached before the grazing season is over, the livestock will be moved to the next unit or off the allotment. This is standard grazing permit administration as described in Part 2 of every FS grazing permit.

Category **Economics**

Letter Number *17 - Curlew DEIS* Comment ID 57

Comment: Western Watersheds Projects request the following be incorporated within all draft alternative proposals that allow permitted livestock use to continue on the curlew National Grassland:

Draft alternatives should include a detailed cost analysis

Response: The FEIS includes an expanded Economic Efficiency Analysis, using present net value (PNV) as the measure. This can be found in Chapter 4, Environmental Consequences, the Economics section of the FEIS. The value of this analysis is not in the absolute amount of the PNV for any one alternative, which can vary by and depends on a set of reasonable assumptions about revenue and cost flows and timing. The importance of the analysis results is the relative value between alternatives which allows comparison, based on similiar assumptions, data and input variables. Cost data were included as part of the original analysis in the DEIS and in this subsequent FEIS analysis. RR

Category **Livestock grazing**

Letter Number *17 - Curlew DEIS* Comment ID 54

Comment: Western Watersheds Project requests that the following be incorporated within all draft alternative proposals that allow permitted livestock use to continue within the Curlew National Grassland:

An automatic, immediate reduction in stocking rates of at least 40% to be taken the first year.

Minimum 6-inch stubble height for all lentic and lotic riparian areas at the end of the grazing or growing season - whichever comes first; including springs, seeps, wet meadows and aspen groves.

Minimum 8 to 12-inch stubble height for all upland perennial bunchgrasses at the end of the grazing or growing season - whichever comes first - to protect sage grouse nesting habitat.

Maximum 5% bank or area trampling from all causes for stream banks, springs, seeps, wet meadows and aspen groves.

Maximum 25% use of woody browse species on new leader growth within reach of livestock.

Response: It is unclear why the commentor is suggesting a 40% reduction in livestock grazing.

Within the range of alternatives presented in the EIS, Alternative C would result in many of the outcomes proposed by the commentor. Livestock grazing would be reduced by about 38% in Alternative C which also requires a 7-inch upland stubble height at the end of the grazing season. This alternative also includes a 20-50% or 2-6 inch stubble height in riparian zones based on the properly functioning condition of the stream. It also establishes riparian/wetland areas at 150 feet on either side of a fish-bearing stream or 75 feet on either side of non-fishbearing streams.

In specifc response to each of your suggestions, we offer the following:

As to your suggestion of an automatic, immediate reduction in stocking rates of at least 40% to be taken the first year, we find this statement unsupported by scientific documentation to implement this measure. Without adequate rationale and scientific documentation, this measure would most likely be considered arbitrary and caprious. The Grassland Plan establishes a generic 50% livestock utilization level for uplands. Once this use level is met, cattle are moved to another pasture or come off the Grassland. In drought years, such as 2001, this can mean a 25 percent reduction, or more. In addition, Alternative H, the selected alternative, emphasizes lighter grazing on native sites and in pastures where sagebrush canopy cover is between 16 an 25 percent that is important to sage grouse nesting and brood-rearing while allowing periodic heavier grazing in pastures where crested wheatgrass is the predominant species to maintain this plant's vigor.

As to you suggestion for a minimum 6-inch stubble height for all lentic and lotic riparian areas at the end of the grazing or growing season - whichever comes first, research shows that four to inches in adequate to maintain stream channel processes (Clary).

Your request to include a guideline or standard to maintain a minimum of eight to twelve inch stubble height for all upland perennial bunchgrasses at the end of the grazing or growing season - whichever comes is more stringent than the seven-inch guideline suggested by Connelly, et al, 2000. During September of 2001 the IDT conducted a field review on the Grassland to look at this issue. The team measured stubble heights in several different fields. The overall average in the grazed units during this drought year was five inches. Thus, it is reasonable to assume that in a "normal" moisture year, many pastures would meet the seven-inch stubble. This is discussed further in the FEIS.

Your suggestion to include direction to maintain a maximum 5 percent bank or area trampling from all causes for stream banks, springs, seeps, wet meadows and aspen groves is addressed in the Grassland Plan under Prescription 2.8.8, Livestock Standard #1 that states that riparian utilization levels will be established at the site-specific level based on PFC status of the stream using approved protocols in an interdisciplinary process. The protocol will set stubble heights, percent utilization limits, bank disturbance, soil disturbance and woody species utilization limits depending on the stream condition and channel type.

Your suggestion to allow a maximum of only 25% use of woody browse species on new leader growth within the reach of livestock is also addressed at the same location in the Grassland Plan

The Grassland Plan also includes a Grassland-wide objective under Livestock Management (See Objective #2).

Letter Number *17 - Curlew DEIS* Comment ID 41

Comment: Western Watersheds Project also requests performance of a competent determination of the capability and suitability of all lands within the Curlew National Grassland. This region falls within ecosystems receiving under 15 inches of annual precipitation and also includes significant geographical areas determined to contain erodible soils that are not suitable for the present permitted livestock uses.

Response: Appendix F in the EIS discusses the criteria and process used to determine the capability and suitability of lands for livestock grazing. The criteria evaluated also are discussed in Chapter 3 o the EIS under "Livestock Grazing." Precipitation is not one of the criteria, but soil is a criteria. Production is also a criteria which is directly affected by precipitation.

All acres on the Grassland met all capability criteria as defined by the Intermountain Region's "Protocol for Rangeland Capability and Suitability Determinations for Forest Plan Revisions" with the exception of a small acreage in the South Huffman field that did not meet the 1.5 mile distance to water criteria. If a water development was located on these acres, all capability criteria would be met. Since the ability to provide water to this location exists, these acres were determined to be capable.

The Forest Service does not use an Interagency Range Handbook to determine rangeland capability and suitability.

Appendix F also includes a discussion of the criteria and process used to determine livestock cuitability. Suitability may change by alternative through the application of management prescriptions.

Letter Number *17 - Curlew DEIS* Comment ID 52

Comment: Utilization standards proposed within the B, D, F and G alternatives are inappropriate to the climate, soils, vegetation types, and other watershed components. Intentions to graze 98% of the habitat, allow stubble heights as low as 2 inches, allow utilization of native and non-native species of up to 60%, allow utilization of woody species of up to 50%, allow bank trampling up tc 40%. These inappropriate standards are completely out of line with the Idaho Sage Grouse Management Plan developed by the Idaho Department of Fish and Game relative to stubble heights and other management factors.

Response: The EIS presents a range of alternatives that incorporate various grazing utilization levels. While your comment appears to refer to utilization levels proposed in Alternative A, other alternatives propose lower utilization levels than Alternative A. (See Alternative Descriptions in Chapter 2 of the EIS).

The effects of treatments and utlization levels proposed in each of the alternatives on wildlife are discussed in Chapter 4 of the EIS under each alternative. Effects of the upland utilization levels are discussed under the Sage Grouse, Guideline 1 heading. Effects of riparian utilization levels are found under the "Effects on Riparian Species" section. The alternative components are displayed in the table at the end of Chapter 2. In addition, the last table in Chapter 2 displays the effects of the alternatives by issue, using issue indicators. The last table also displays how the alternative meets the Sage Grouse Guidelines (Connelly, et al, 2000). These guidelines are similar to those proposed in the Idaho Sage Grouse Management Plan (1997).

Because Alternative H, the selected alternative, incorporates guidance to implement lower use levels in sage grouse nesting habitat and on native vegetation sites, it is predicted these management changes will improve sage grouse nesting and brood-rearing habitat (EIS, Chapter 4, Wildlife Habitat Management).

The Monitoring Plan in the Grassland Plan has been expanded to include more intensive monitoring to insure management practices and uses are meeting stated Goals and Objectives in the Grassland Plan. (See Chapter 5, Grassland Plan).

Letter Number *17 - Curlew DEIS* Comment ID 53

Comment: The limited proposed standards and/or guidelines that vary between Alternatives B, C, F and G reflect out-dated and inappropriate use/utilization levels for both riparian and upland plant communities and do not appropriately address the needs of wildlife species.

Either a new resource-appropriate land management alternative needs to be drafted entirely, or substantial modifications and revision need to be made to an existing alternative, such as Alternative C (upland game bird management emphasis).

Response: The EIS evaluates a full range of alternatives and grazing Standards and Guidelines, including a no grazing alternative (Alternative D). As documented in the EIS, some alternatives meet wildlife needs better than others. The Forest Leadership Team and the ID Team believe that the grazing stubble height and utilization standards are not outdated or inappropriate, as documented by the numerous references cited and used. Without more information from the commentor, we cannot address this issue.

The EIS contains extensive documentation to support the Forest Service claim that Alternative H would improve watershed and riparian conditions and water quality, improve understory vigor, and provide for wildlife habitat over the long-term. Further, Alternative H was developed to allow more flexibility and adpatability in grazing standards to meet site-specific resource needs.

Letter Number *17 - Curlew DEIS* Comment ID 43

Comment: The primary reason for such unacceptable riparian conditions on the CNG is the Forest's failure to require even minimal riparian utilization standards for livestock grazing. A major contributing factor is the Forest's unscientific requirement that grazers utilize 60% of wheatgrass (Curlew AMP, p. 13). Such high utilization of Crested wheatgrass ensures even higher use of more palatable upland grasses and forbs valuable to wildlife and complete consumption of riparian vegetation.

Response: You are correct that there are no specific utilization standards for vegetation within riparian area identified in the 1985 Land & Resource Management Plan for the Caribou National Forest and Curlew National Grassland. This shortcoming was identified in the 1999 Analysis of the Management Situation for the Curlew National Grassland, and specific standards were proposed in the September 2000 Draft Plan for the Grassland. These proposed standards, if adopted, would specify specific allowable utilization levels of vegetation within riparian and wetland areas (RWAs) regardless of the upland utilization levels. The Plan proposes to manage vegetation utilization levels by establishing riparian pastures and/or corridor fencing.

However, this will not correct all the riparian problems. Most of the stream systems on the Grassland have been downcut from erosion over a period of many years, starting when the area was first settled and farmed. Because of adjacent farming activities, soils are sometmes left fallow. Chapter 3 in the EIS contains photographs of a flash flood event in 1998. Headwaters that are located above the Grassland in areas that are currently being farmed continue to suffer from periodic downcutting caused by summer downpours and scouring of soils coming off fallowed land. Evidence of othese events can be seen in the North Fork of Rock Creek and Rock Creek. These creeks are so entrenched that the riparian zone will not appreciably improve until the annual scouring events cease and a new flood plain is established. As these flash flood events continue to occur, the volume of flow is greater than the channel can absorb. As a result the channel will continue to adjust. For a good discussion on stream hydrology and channel evolution, see Applied River Morphology by Dave Rosgen, 1996.

It also should be noted that more than 36,000 acres on the Grassland have been planted to introduced non-native species, such as crested wheatgrass. Only 12,000 acres remain in native vegetation. Because this landscape has been highly altered through years of farming, it should not be compared to a native shrub-steppe ecosystem that is generally found in areas that have not been farmed or plowed.

With low use levels on crested wheatgrass sites, grazing is very uneven; some plants are totally grazed while other plants are left untouched. The untouched "wolf" plants become coarse and unpalatable. After many years, the ungrazed plants lose vigor and the undersoty becomes very patchy. (See FEIS, Chapter 3, Disturbances, Crested Wheatgrass). The remaining 25 percent of the Grassland is a native bunchgrass type. These area are in the more rugged terrain that was not plowed. Due to the topography and distance from water, it is unlikely that utilization would reach 40% on this sites before the 50% use level is met on crested wheatgrass. Thus, livestock would probably be moved at much lower use levels.

Alternative H, the selected alternative in the Record of Decision, was developed in response to public comments on the Draft EIS and Draft Plan. This alternative creates exclosures on those streams that have the greatest potential to improve with exclusion of livestock. On stream such as Rock Creek, riparin pastures would be created and use levels would be established to maintain/improve conditions.

Category **Revised Plan**

Letter Number *17 - Curlew DEIS* Comment ID 56

Comment: Western Watersheds Projects request the following be incorporated within all draft alternative proposals that allow permitted livestock use to continue on the curlew National Grassland:

Inclusion of appropriate monitoring procedures for the determination of compliance with Forest Plan standards and guidelines.

Response: Chapter 5 of the Grassland Plan identifies monitoring items and prioritizes each. As a result of public comments on the Draft Plan, the monitoring chapter in the Final Grassland Plan has been expanded.

Livestock use will be monitored using the USFS Intermountain Region's protocol, including a separate monitoring item that requires the monitoring of residual vegetation height after cattle are moved from a field.

Letter Number *17 - Curlew DEIS* Comment ID 58

Comment: Monitoring becomes extremely important in the development and implementation of Forest Plans as it is the method by which the agency, as sell as the public, can determine the success or failure of such plans.

A 1998 Cost Share Partnership project for the Curlew National Grassland noted, "the riparian conditions observed in this IWF study indicate non-adherence with the Forest Plan Standard and Guideline … The paucity (lack) of current range and riparian monitoring on the Curlew allotment indicates non-adherence to the Forest Plan Standard and guideline (Forest Plan, III-34) to "Establish a monitoring system on each allotment to determine range trend and grazing capacity."

Forests are required to determine compliance with standards and guidelines and management requirements as outlined in Forest Plans (McDougle 1988). Monitoring is the process by which it can be determined if plans, prescriptions, projects, and activities have been implemented as designed and whether or not such undertakings are in compliance with Forest Plan objectives, standards and guidelines (McDougle 1988). Monitoring is a weak link in the original Forest Plan; that shortcoming need should be addressed in all new plan alternatives.

Response: Chapter 5 of the Draft LRMP for the Curlew contains the the monitoring plan for the Grassland. It includes legally required monitoring as well as monitoring to help identify if goals, objectives, standards and guidelines are being met. In addition, the monitoring plan provides a priority rating and a frequency of monitoring. Monitoring Chapter (Chapter 5) in the Final Grassland Plan has been expanded.

The Forest Service is required to produce an annual monitoring report which provides results of annual monitoring. Curlew NG monitoring will be included in the annual report.

Letter Number *17 - Curlew DEIS* Comment ID 59

Comment: Under any of the alternatives, funding is supposed to be committed to meeting permit obligations, environmental protection, and mitigation under the following priority schedule:

Grazing allotment permit administration

Priority 1 monitoring

Riparian restoration actions, such as fencing or improvement projects

As is evidenced by this schedule, environmental considerations have been relegated to last place and are very minimal in nature; with the first priority being directed towards livestock use.

Response: We recognized that available funding is not always adequate to do all the actions proposed in a programmatic plan such as this. Therefore, we tried to stress that certain actions were more fundamental and important than others to ensure that environmental protection and resource sustainability were provided even if funds were less than optimal. Permit administration includes all of the monitoring and enforcement in administering grazing on the CNG. It includes utilization, enforcement of utilization standards, maintenance requirements, etc.

Environmental considerations are actually the foremost consideration of these priorities. Permit adminitration is the most important action we can take to work with permittees and ensure that livestock grazing occurs within the standards necessary to protect resources. Priority 1 monitoring was developed to provide answers, or at least, deeper understanding in those important areas where we currently lack much data or information. Such monitoring can lead to improved management practices that may be unforeseen with current knowledge. Finally, we propose that riparian restoration is more important than certain other management options provided in the Plan involving commitment of limited funds, such as planting new tree rows or a pond development.

Category **Riparian Areas**

Letter Number *17 - Curlew DEIS* Comment ID 55

Comment: Western Watersheds Projects request the following be incorporated within all draft alternative proposals that allow permitted livestock use to continue on the curlew National Grassland:

A cobble-embededness standard for streams not to exceed 20%.

Response: Cobble-embeddedness is used as an indicator for overall benthic habitat health. Benthic insect populations and potential spawning, egg incubation and fry emersion success for salmonids have been tied to the amount of fine sediments within the coarser gravels and rocks found on the stream bottom (Waters 1995). Within the Grasslands, there are no known salmonid populations except those introduced species associated with Stone Reservoir and its backwaters to Deep Creek spring. An embeddedness standard within these depositional areas would not be appropriate. Only common dace and shiners have been found within other stream reaches within the Grassland. There is no known literature that associates substrate requirements with 20 percent cobble embeddedness for these species. In order to support other aquatic biota, and other designated beneficial uses of the surface water within the Grassland, the Forest relies on State water quality and TMDL rules and regulations which identify specific water column requirements, but do not currently contain any substrate standards.

Category **Wildlife**

Letter Number *17 - Curlew DEIS* Comment ID 50

Comment: … issues pertaining to Sage Grouse and other sage-brush obligate species have not been appropriately addressed by the draft alternatives. While a majority of the vegetation projects noted in the alternatives involve the use of prescribed fire, such projects typically fulfill objectives for livestock grazing forage with less benefits for wildlife.

Response: The Alternatives provide a range of vegetation treatments. Prescribed fire (outside of bulbous bluegrass treatments) is not proposed in Alternatives C, D, F and G. Limited prescribed fire use, if necessary, is allowed in Alternative H, the selected alternative in the Record of Decision, to maintain the existing sagebrush canopy cover over the ten-year Plan period. Other treatments, which will result in residual sagebrush canopy cover by using light to heavy herbicide applications, are proposed in Alt C, F, G, and H. Effects of these alternatives on sage grouse and other sagebrush obligates (through sage grouse as MIS) are documented in Chapter 4 of the FEIS.

Category **Alternatives**

Letter Number *18 - Curlew DEIS* Comment ID 158

Comment: The current proposed Alternative G appears to be one-sided (against ranchers), causes increased fire danger, results in miles of additional fence and fence maintenance, all of which is expensive and does not comply with the Bankhead Jones Act currently in place. Also it results ir a substantial loss of revenue for Oneida County.

Response: Based on public comments on the EIS, the ID Team developed Alternative H, the selected alternative. This alternative would maintain the current percent of acres in each sagebrush canopy over class over the 10-year plan period through a variety of vegetation treatments. In addition, upland utilization levels would be established at 50 percent grassland-wide with further refinement in Allotment Management Plan updates. Corridor fencing would be reduced and applied only on "at risk" streams (approximately 5 miles) that would benefit from fencing. The remaining perennial streams would be fenced into riparian pastures using existing fences where feasible. Riparian livestock utilization would be determined based on the properly functioning condition of the stream. Those streams that are non-functioning would be grazed using light utilization standards, while those streams in properly functioning condition would be grazed at a level that maintains properly functioning condition.

The effects of Alternative G on revenues in Oneida County are disclosed in Chapter 4, Environmental Consequences, Economic and Social Values section. The economic analysis was modified between the Draft EIS and Final EIS, and the effects are more accurately described in the FEIS. The most important use of the findings is to display relative changes in economic outputs among alternatives rather than veiwing the numbers as absolute changes in county income and jobs.

Title 3, Section 31 of the Bankhead Jones Farm Tenant Act states, "The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impariment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare, but not to build industrial parks or establish private or commercial enterprises."

Titles I, II and IV were repealed by Congress by the Agricultural Act of 1961. P.L.. 87-128. Title III, though not repealed, has been amended several times since 1937. In the 1960's, the Secretary of Agriculture issued three administrative orders involving the National Grasslands. The 1963 Order was perhaps the most significant since this order amended the management direction in the preceeding two orders. Section 213.1 of the 1963 Order in part states, "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use and to promote the development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas where the National Grasslands are a part."

The most significant Act affecting the National Grasslands, since the passage of the Bankhead-Jones Farm Tenant Act of 1937, was the enactment of the National Forest Management Act (NFMA) in 1976. Among other things, the Act requires the preparation of management plans for all units of the National Forest System of which National Grasslands are a part. In the early days the focus of National Grasslands was on the value of stabilized watersheds, the productive use of forage by livestock and the relationships of both to rural community stability. Since then, many other values have been added - oil, gas, uranium, and coal; open space vistas; cultural resources; recreation opportunities; wildlife habitat; enjoyment of native plants; threatened and endangered plant and animal species; outdoor laboratories; and solitude.

Category **Comment Noted**

Letter Number *18 - Curlew DEIS* Comment ID 159

Comment: I would recommend that careful consideration be given to using the current Alternative A which has been in place for years and has a proven track record that is beneficial to all parties involved. If something is not broken why fix it? Men with years of experience like Mr. Frank Gunnell and Mr. Ken Timothy have maintained and monitored the Curlew NG where wildlife and livestock have coexisted in a healthy productive ecosystem which has benefited both.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Alternative H, the selected alternative in the Record of Decision, was chosen to balance these issues with current livestock use.

Category **Economics**

Letter Number *18 - Curlew DEIS* Comment ID 161

Comment: The livelihood of local ranchers should not be jeopardized by someone else's desire to hunt sage grouse.

Response: The intent of the Curlew Grassland Plan is to provide multiple use opportunity consistent with protection of natural resources and ecological function of the Grassland ecosystem--including resident wildlife species. We believe the Plan provides effective protection of resources and the opportunity to use Grassland resources to benefit visitors and local communities, including grazing permittees.

There are many factors outside the scope of this analysis that affect the livelihood of local ranchers, such as, market conditions and beef prices, increasing production costs, competition from other producers locally, in other regions of the country, even internationally; changes in regulations; disease and predation; and individual management effectiveness. These likely have more direct and indirect effect on a given ranching enterprise. Still, the effects of managing for viable populations of sage grouse while providing permitted grazing opportunity are disclosed in the Wildlife and Economic sections of the FEIS, Chapter 4.

Policies on hunting sage grouse are the State's responsibilty and outside the scope of this analysis. The Forest Service does cooperate with the State in trying to meet State wildlife management goals, when consistent with Forest Service multiple use and ecosystem management objectives, as well.

Category **Wildlife**

Letter Number *18 - Curlew DEIS* Comment ID 160

Comment: Sage grouse populations are going to cycle naturally but for a period of years from 1986-1989 (23 days) and from 1990-1995 (30 days) hunting season was opened for 23-30 days with a 3 pe day bag limit instead of 7 days with a 1 per day bag limit. This practice has put a significant impact on sage grouse numbers. Ranchers using the Curlew NG should not be blamed for low sage grouse numbers because of someone else's (Idaho Fish and Game) poor management decision.

Response: Hunting seasons and bag limits are outside of the scope of this analysis. Hunting seasons are outside the scope of this analysis.

Hunting seasons should be based on careful assessments of population size and trends (Connelly et al 2000). The season was changed in 1996 to reflect population trends (See Chapter 3 of the EIS). After analysis, the IDFG has decided to continue the restricted season (7 days with one per day bag limit) for 2001.

The Forest Service, however, has a responsibility to manage the habitat so that we provide for species viability. This responsibility exists regardless of the type of management the Idaho Fish and Game proposes. Sage grouse are one of the issues on the Grassland and the alternatives propose an array of management techniques to address this and other issues.

Category **Alternatives**

Letter Number *19 - Curlew DEIS* Comment ID 35

Comment: We vigorously oppose Alternatives A, B, and E for many good reasons. First, none of these alternatives come anywhere close to even approximating the Idaho Sage Grouse Guidelines and as such are likely to trigger listing under the ESA for sage grouse.

Response: The FEIS discloses the environmental consequences of each alternative. Some alternatives would meet basic habitat guidelines as defined in the State of Idaho Sage Grouse Management Plan (2000). Other alternatives would partially meet or would not meet the guidelines. Refer to Summary Table of Effects in Chapter 2 of the EIS for a comparison of environmental effects, including which alternatives meet the guidelines in the Sage Grouse Management Plan.

Alternatives are designed to resolve the significant issues that are derived from public scoping and input. Alternatives A and B are the original No Action and Proposed Action that initiated the NEPA process and public involvement. Alternative E was designed to address the issue related to public input for grazing opportunity and emphasizing outputs. While they may not meet one or several particular objectives, in this case, emphasizing sage grouse habitat, they satisfy NEPA requirements to address an adequate range of alternatives.

Letter Number *19 - Curlew DEIS* Comment ID 31

Comment: What disturbs us most about Alternative G is the treatment of 5,000 acres of sagebrush over the next 10 years. Unfortunately many of these areas are near leks and are currently the best nesting and brood rearing habitats left on the Curlew National Grassland. We strongly question the wisdom of burning off the "last of the best" habitats at this point in the history of sage grouse management.

Response: Based on public comments on the DEIS, the ID Team developed Alternative H, the selected alternative. This alternative would maintain the current percent of acres in each sagebrush canopy over class over the 10-year plan period through a variety of vegetation treatments.

Alternative H includes 2,500 acres of bulbous bluegrass treatment and 9,600 acres of herbicide treatment in sagebrush with greater than 15% canopy cover. Both treatments would be planned at the site-specific level to incorporate Forest Plan goals and guidelines. Management direction in the Plan includes habitat mapping (in cooperation with IDFG) of functional and degraded beeding habitat and winter habitat, and prioritization of treatments in areas where sagebrush canopy cover is greater than 25 pecent. Effects of the proposed treatments on sage grouse are described in Chapter 4 of the EIS.

Most of the bulbous bluegrass sites have very little value for sage grouse due to the depauperate understory (ID Team Field Trip 9/01).

Letter Number *19 - Curlew DEIS* Comment ID 38

Comment: We strongly prefer Alternatives C and G. Alternative G would be acceptable with a decrease in the number of acres treated by fire, plowing, and reseeding, especially if the reseeding were accomplished with native species including shrub species only.

Response: The selected alternative, Alternative H, treats approximately 2,500 acres using prescribed fire on sites where bulbous bluegrass is predominant in the understory. The acres to be treated by fire, plowing and reseeding are designed to improve understory diversity. Treated sites would be reseeded using both non-native and native grass, forb and shrub seed mixes, based on site-specific analysis of proposed treatment sites. Reseeding with shrub species only may allow the increase of undesireable plants such as cheat grass.

Letter Number *19 - Curlew DEIS* Comment ID 36

Comment: These three (A, B, and E) alternatives would use fire to destroy large tracts of the remaining sagebrush canopy above 15%, even further fragmenting what little sage grouse habitat remains on the Curlew National Grassland.

Response: Alternative H, the "selected alternative," proposes to treat 2,500 acres using prescribed fire, primarily in areas where bulbous bluegrass is dominant in the sagebrush understory to improve nesting and brood-rearing habitat in these areas. The remaining acres proposed for treatment would be managed using herbicides. The primary objective of treatments would be to maintain the existing percent of acres in each of the canopy cover classes over the ten-year Plan period. Adaptive management and monitoring efforts during the Plan period should help us better understand the effects of our management on sagebrush obligate species, including the sage grouse.

Of the nineteen existing patches (320-acres or greater) of sagebrush in greater than 15% canop cover, six patches would remain at the end of the ten-year planning period, with an additional ten patches moving into the greater than 15% canopy cover during the early part of the next decade.

Effects of the proposed treatments on fragmentation/patch size are discussed in Chapter 4 Wildlife Habitat Mangements section in each alternative discussion under the subheading "Effects on Sagebrush Habitats."

Letter Number *19 - Curlew DEIS* Comment ID 24

Comment: After close scrutiny of alternatives A through G, we find them all to be lacking in some degree to provide protections to upland game bird, especially sage grouse habitats that are necessary to their perpetuation, restoration, and increase.

Response: The effects of all alternatives are disclosed in Chapter 4, Environmental Consequences, Wildlife section. The effects also disclosed the degree to which management actions under the alternatives would affect Grassland species and habitats.

All alternatives, with the exception of Alternative A, either paritally meet or meet the State Sage Grouse Habitat guidelines. Alternatives C, G, and H would better meet the guidelines than the other alternatives.

Letter Number *19 - Curlew DEIS* Comment ID 37

Comment: Alternatives A, B, and E would provide no streamside improvement thus doing little to improve riparian areas so important to mid and late summer sage grouse brood rearing.

Response: The Summary Table of Effects in Chapter 2 of the EIS compares the alternatives based on rate of recovery of riparian habitats. All of the action alternatives address riparian recovery to some degree.

Both Alternatives B and E establish Riparian Wetland Areas (RWAs) and provide some streamside grazing standards and guidelines, thereby potentially improving overall riparian conditions over present. These protection measures may not be as effective as some other measures presented in other alternatives, but they are better than the present situation (Alternative A), which does not identify any specific protection measures.

Effects of riparian grazing on riparian-associated species and their habitat (including sage grouse brood-rearing habitat) is discussed in Chapter 4.

Category **Comment Noted**

Letter Number *19 - Curlew DEIS* Comment ID 25

Comment: Watershed and riparian area habitat condition must be improved to provide adequate brood rearing for sage grouse chicks so there will be adequate recruitment to sage grouse populations

Response: Comment noted; all of the alternatives maintain or improve watershed and riparian habitat conditions to varying degrees (See Summary Table of Effects at the end of Chapter 2 in the EIS). The habitat needs of sage grouse have been displayed in Chapter 3 of the EIS and effects of the alternatives on sage grouse are disclosed in Chapter 4 of the EIS.

Letter Number *19 - Curlew DEIS* Comment ID 39

Comment: We believe that elements of Alternative C and Alternative G have merit in future management planning of the Curlew National Grassland. These two alternatives meet the Idaho Sage Grouse Guidelines. Both alternatives provide for good to excellent rehabilitation of riparian areas critical for mid to late summer brood rearing presently in abominable, i.e., non-functioning condition. Both alternatives also provide adequate sagebrush canopy cover by Year 10. For overall health of the sagebrush steep ecosystem present in the Curlew National Grassland, both Alternatives C and G move vegetation toward a properly functioning condition in the near term.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative H, the selected alternative in the Record of Decision, meets these same objectives in a different way with less impact on grazing operations.

Letter Number *19 - Curlew DEIS* Comment ID 40

Comment: We strongly support the riparian rehabilitation aspects of both these alternatives [C and G]. We also strongly support the 10-year goal of having 28% of the Greater Curlew Valley in sagebrush canopy cover above 11%. These efforts would provide the best plan for restoration of sage grouse populations in the Greater Curlew Valley and would, we feel, provide the best plan to avoid the listing of the sage grouse under the Endangered Species Act (ESA).

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative H, the selected alternative in the Record of Decision, meets the objectives you described in your comment.

Category **Livestock grazing**

Letter Number *19 - Curlew DEIS* Comment ID 29

Comment: While it is likely that fewer livestock (calves) might come off of ranges on the Grassland, personal experience from the Muddy Creek Basin in Wyoming indicates that increased forage production would result in much higher calf weights negating any potential economic loss. Calves coming off a range weighing 50 to 60 lbs. more per individual represent a significant economic benefit to permittees.

Response: This is true but site specific analysis will have to determine the exact levels of any reduction in livestock grazing. Any reduction in grazing would be bsed on use levels developed at the site-specific level.

Moderate continuous grazing typically gives better vegetation, livestock, and financial performance than rotation grazing at heavy stocking rates. However, under moderate stocking rates there is evidence that some rotation grazing systems give equal or superior vegetation, livestock, and financial performance to continuous grazing (Holechek, Gomez, Molinar, and Galt 1999).

The Land and Resource Management Plan for the Curlew National Grasslands proposes a forage utilization levels grassland-wide at 50% for both native and non-native vegetation. Use levels may be higher in pastures that are predominantly crested wheatgrass and lower on sites that support native vegetation understory or in important sage grouse nesting and brood-rearing habitat.

Category **Vegetation**

Letter Number *19 - Curlew DEIS* Comment ID 33

Comment: While Alternative G proposes a 5km buffer zone around occupied sage grouse leks, the exception of where bulbous bluegrass is present makes for a wide future interpretation of how much bulbous is significant. Would finding 2 or 3 bunches of bulbous bluegrass be enough to trigger a burn? Herbicide treatment is a much-preferred alternative.

Response: Prescribed fire/plowing treatments in Alternative H, the selected alternative, would be focused on areas where the understory is dominantly bulbous bluegrass. Herbicide treatments would be focused on areas where the big sagebrush canopy cover is greater than 15 percent (with priorit given to sagebrush canopy over 25%) with the objective to reduce the canopy cover to 6-15 percent.

The use of herbicide allows the manipulation of sagebrush canopy cover to increase understory vegetation diversity and is proposed in several of the alternatives. The grass and forb understor are important habitat components for many species; for sage grouse these components are critical for nesting cover, and foraging habitat during brood-rearing. Other types of treatments, including bulbous bluegrass treatments, may increase grass and forb diversity/abundance but result in the loss of the sagebrush canopy. This will generally make the stand unsuitable for nesting until the sagebrush is reestablished to around 15-25% canopy cover.

The LRMP includes a guideline that treatments will consider sagebrush canopy cover and proximity to known active lek sites. Higher priority will be given to treatments in sagebrush in the greater than 25% canopy cover class.

Treatments around leks would be considered on a site-specific basis. The understory density of bulbous bluegrass would be one consideration but "finding 2 or 3 bunches of bulbous bluegrass" would not be enough to trigger a burn. Bulbous bluegrass was planted in many of the seeding mixes with crested wheatgrass and alfalfa when the soils were being stabilized by the Soil Conservation Service (now the Natural Resource Conservation Service) in the 1950's. In some pastures, it has dominated the seeding, reducing even further the residual vegetation opportunites and forage production. In these cases, using herbicide to reduce canopy cover would not provide any benefits, because there is not enough desirable understory vegetation to be of any benefit to either wildlife or livestock. However, before any treatment was approved, a site-specific analysis would have to be conducted and the trade-offs analyzed with public input.

Letter Number *19 - Curlew DEIS* Comment ID 27

Comment: We are very skeptic of language such as "reseeding to native forbs and grasses when available or "if necessary" and the like because long history of the USFS actions demonstrates that this is merely a pretext to re-vegetate with crested wheat grass, a species of little benefit to sage grouse.

Response: Restoration efforts are receiving more emphasis for consideration in multiple goals, specifically the reestablishment of community processes, structure and function. However, in the past, single goals were usually the reason for any vegetative work, I.e., increased grazing capacity with crested wheatgrass seedings. On the Grassland, we are trying to be more cognizant of the wildlife uses along with the needs to maintain forage for livestock. We will consider all needs during reseeding opportunities.

Letter Number *19 - Curlew DEIS* Comment ID 32

Comment: We are very concerned that ultimately these areas would be re-vegetated with a mixture of nativ and non-native grasses and forbs. Again, past history indicates this to merely be a euphemism for reseeding to crested wheatgrass.

Response: Uses of the land and overall management goals need to be considered during site-specific vegetation projects. These goals can change over time and with changing societal needs. Past management emphasized forage for livestock grazing. Crested wheatgrass provides good forage production in these kinds of environments. In the future, goals and objectives in the Curlew LRMP include an awareness of other ecosystem goals and more emphasis on diverse vegetative communities in treated areas.

Letter Number *19 - Curlew DEIS* Comment ID 34

Comment: The issue of number of miles of tree row planting is an issue we view as bogus in its entirely. Because of lack of water development to these sites, tree growth is problematic at best. We car currently demonstrate miles of tree lines in very poor shape, virtually without benefit to wildlife. Why would we believe anything better might become of future tree lines?

Response: The selected alternative (Alternative H) does not include any additional tree rows.

In areas that currently support the existing tree row, tree growth is problematic. There were no trees on the Grassland, with the exception of a few willows along riparian zones. Many of the tree lines have not survived, and the ones that have survived have done so with initial watering, care, and fencing to get them established and protect them from grazing. However, once we found which tree species would survive best in that environment and once they were establishe we found that they provide excellent winter habitat to several species including introduced bird species for recreational hunting. They currently provide wildlife food, cover and habitat diversity They provide habitat for cottontail rabbits, mourning doves, ravens and raptors, (AMS p 24) and in the winter they are also used by pheasants and Columbian sharp-tailed grouse. The effects o the tree rows under each alternative are addressed in the FEIS, Chapter 4.

Category **Wildlife**

Letter Number *19 - Curlew DEIS* Comment ID 30

Comment: We strongly question whether sage grouse populations have the 30 years on the Curlew Grassland to wait until large tracts of land reach the stage of 15-30% canopy cover for optimal nesting success.

Response: The Grassland Plan includes standards and guidelines to manage sagebrush habitats. They include a guideline prioritizing treatments of sagebrush in the greater than 25% canopy cover class. This will maintain stands in the 15-25% canopy cover class, that should have the grass and forb understory diversity needed during nesting and brood-rearing.

The alternatives provide an array of treatment methods that will be used to create a diversity of sagebrush canopy cover classes.

Alternative H, the selected alternative in the Record of Decision, would maintain the existing sagebrush canopy cover over the ten-year Plan period using a combination of light and heavy herbicide applications and mechanical methods. These methods of treatment provide better control for creating mosaic patterns rather than large tracts of land reverting to the 0-5 percent canopy class as a result of prsecribed fire treatments. Prescribed fire would be allowed on a limited basis as a tool to maintain the existing sagebrush canopy cover, if necessary. Vegetation treatments will be prioritized in areas of the Grassland that are currently in greater than 25 percent canopy cover. In addition, this alternative proposes adaptive strategies for livestock grazing and an emphasis on improving riparian areas and focused monitoring, including annual utilization monitoring on key areas and annual utilization mapping.

Letter Number *19 - Curlew DEIS* Comment ID 26

Comment: Current research shows beyond any reasonable doubt that sage grouse hens on the Curlew National Grassland seek out and utilize areas of sagebrush canopy density of 25%. It is only in such areas that nesting attempts are successful and without successful nesting, sage grouse populations will only decline further.

Response: Apa (1998) found that horizontal sagebrush cover is important to sage grouse hens in the Curle Valley, as it is in other areas. Sage grouse nest success under sagebrush plants was higher tha those not under sagebrush. Connelly et al (2000) identify breeding habitat as sites with sagebrush canopy cover from 15-25% (along with other criteria).

The Grassland Plan includes a guideline that prioritizes treatments in sagebrush with canopy cover >25%. This will maintain stands in the 15-25% canopy cover class, that should have the grass and forb understory diversity needed during nesting and brood-rearing.

Letter Number *19 - Curlew DEIS* Comment ID 28

Comment: Lastly, we are concerned with any alternative not providing adequate sage grouse wintering habitat. Any alternative acceptable must provide enough habitat for the varying seasonal requirements of sage grouse. It is unlikely that any alternative addresses all of these requirements adequately.

Response: Effects on potential sage grouse winter habitats are discussed in Chapter 4, by alternative, unde section Sage Grouse, Guideline 4. Currently about 59% of the sagebrush is in the canopy cover >15% category. Two alternatives would result in a decrease; five alternatives would result in an increase and one alternative would remain about the same.

Effects on potential nesting and brood-rearing habitat are also discussed in Chapter 4, by alternative, under Sage Grouse Guideline 1.

The alternatives meet the needs of sage grouse to varying degrees; sage grouse habitat was only one of the issues which was included in alternative development.

The Grassland Plan also contains direction for the management of sage grouse habitat. One goal is to cooperatively (with IDFG) prepare a map of functional and degraded breeding habitat and winter habitat. In addition, there are guidelines for vegetation treatments in sage grouse habitat (Please refer to Grassland Plan, Wildlife Habitat Management, Standards and Guidelines).

Category **Comment Noted**

Letter Number *2 - Curlew DEIS* Comment ID 110

Comment: The Twin Springs Campground … there exists an opportunity to expand the campground by two or three sites. These extra sites are badly needed during the fall hunting season as hunter camps are creeping out of the contained area.

Response: Thank you for your comment. This is outside of the scope of the Curlew Grassland Plan. We have forwarded this observation to the Recreation Staff Officer of the Caribou-Targhee and the Westside District Ranger to look into.

Letter Number *2 - Curlew DEIS* Comment ID 107

Comment: Alternative D would serve resource and wildlife values best. However, it is obviously not going t be considered. Therefore, I am guessing that is the chosen one and will be implemented in some fashion. Alternative G is not the best choice for the ecosystem nor the wildlife resource. It is recommended that Alternative C be selected and implemented immediately.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative H, the selected alternative in the Record of Decision, in a combination of several components of the alternatives in the Draft EIS and was developed in response to public comments. It emphasizes adaptive management strategies and focused monitoring and provides a balance of human uses while improving sage grouse habitat.

Letter Number *2 - Curlew DEIS* Comment ID 109

Comment: At the Twin Springs Campground it appears that no maintenance has been conducted o on the camp units for several years. Restrooms have been dirty and very seldom cleaned. In 2000 the pump handle was not installed the entire recreational year. When the Idaho Fish and game was ask why the pump was not functional, they replied the Forest did not have time to install it. The Idaho Fish and Game also added that they offered to pay for the testing of the water at the Twin Springs Campground but the Forest refused. However, the Forest did have the time and money to send personnel around and post the fire hazard signs everywhere. This appears to be a deliberate attempt to reduce recreational usage in this particular area.

Response: Thank you for your comment. This is outside of the scope of the Curlew Grassland Plan. We have forwarded this observation to the Recreation Staff Officer of the Caribou-Targhee and the Westside District Ranger to look into.

Letter Number *2 - Curlew DEIS* Comment ID 3

Comment: Alternative D would serve resource and wildlife values best. However, it is obviously not going t be considered. Alternative G is not the best choice for the ecosystem nor the wildlife resource. It is recommended that Alternative C be selected and implemented immediately.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

We believe Alternative H, the selected alternative in the Record of Decision, provides a better balance between human uses, such as livestock grazing, and wildlife needs in an adaptive framework that emphasizes focused monitoring.

Letter Number *2 - Curlew DEIS* Comment ID 108

Comment: The enforcement of the utilization standards is seen as the most difficult portion of this plan. To begin with, livestock operators will be reluctant to move their cattle until actually forced to do so. The Forest personnel (being very pro livestock) have demonstrated a reluctance to make the permittees move their stock in a timely manner. For that matter that have not made them remove their livestock until the dates in the Annual Operating Plan says they have to, regardless of the deteriorated condition of the resources.

Response: Thank you for your comment. While enforcement of utilization standards is vital to the successful implementation of the Curlew Grassland Plan, it is outside of the scope of this analysis. It is reasonable to assume that the permit administrators will properly administer the livestock grazing permits, including enforcing the livestock utilization standards. Present livestock management is displayed in Chapter 2, Alternative B and Chapter 3 of the EIS.

Category **Livestock grazing**

Letter Number *2 - Curlew DEIS* Comment ID 96

Comment: The DEIS lists that approximately 60% overall utilization is currently being consumed by livestock. Actual grazing utilization data are lacking. Use pattern maps were not presented. Despite requests for actual use data and annual use pattern maps, they were not presented for. How are stakeholders to evaluate the projected 40-50% upland utilization figures without comparative data? The previous 10 years' data should be presented to evaluate livestock number, aums, and how recommendations will effect (sic) the resources.

Response: Livestock grazing effects were analyzed based on estimated forage production, proposed livestock utilization levels and proposed vegetation treatments in each alternative. The EIS states “Decisions made in the revised grassland management plan will not determine the number of livestock allowed to graze on the Grassland, nor the preferred grazing system or length of grazing season.”

Although historic data is important, it is not essential to a reasoned decision. The trend in the uplands on the Grassland has been upward. Thus, a lower use rate may speed up the rate of trend, at least on native range sites. Also, since actual use, the amount of time the livestock are actually in the unit, is based on the allowable use and generally varies each year. In this regard, historic use levels become less important. The monitoring program in the Grassland Plan set criteria for monitoring and documenting actual use, including annual utilization mapping.

Category **Revised Plan**

Letter Number *2 - Curlew DEIS* Comment ID 98

Comment: It is listed that the Forest will develop a monitoring protocol. Why are the standard forest monitoring protocols not being used and why do new protocols need to be developed?

Response: Standard, approved protocols should be used to develop monitoring methods for specific items identified in Chapter 5 of the Curlew Plan. In some cases we will use current protocols but if the do not give us the information we need, we could modify our protocol. These modifications would need Regional Office approval.

Letter Number *2 - Curlew DEIS* Comment ID 100

Comment: Whatever utilization is allowed by livestock, the standards need to be posted so anyone can review them and immediately determine use.

Response: The Grassland Plan and the Allotment Management Plans are public documents and are available upon request. Each year annual operating instructions are developed based on the AMP and environmental conditions. These contain specific grazing instructions, rotation schedules, allowable use levels, etc. These are available upon request from the Westside Ranger District.

Letter Number *2 - Curlew DEIS* Comment ID 101

Comment: A more functional livestock system needs to be developed and published. It appears that the prior system was "dump them and move them when it's convenient." Resource damage was very evident each year. The rotation system needs to be published with approximate move dates. This keep everyone honest when all stakeholders are cognizant of the rotation and movement schedule.

The livestock numbers and length of time in each pasture needs to be reduced to control overgrazing. Under current grazing system, very little residual understory is left after mid-summer. Even less understory is available for nesting grouse in the spring. This is not acceptable. Livestock management needs to be monitored more scrupulously to avoid this annual problem. I suspect the Forest does not want to enforce these regulations as conflict is always unpleasant.

Response: The Curlew Analysis of the Management Situation and the purpose and need identified in the DEIS described concerns that this planning effort is trying to address. The Plan establishes utilization levels, riparian grazing standards for livestock use to allow more rapid recovery of riparian systems.

Allotment specific measures, such as livestock numbers or system, season of use are more appropriately addressed in follow up site-specific allotment management planning and Annual Operating Instructions. Move dates vary yearly based on current conditions and when utilization standards have been reached.

Letter Number *2 - Curlew DEIS* Comment ID 102

Comment: When do the current grazing management "contracts" expire? It is understood that the contracts expired in 1999. If this is the case, why was livestock use allowed on the Curlew NG without a public scoped grazing contract? Are these grazing contracts currently in place? How long are they recognized as valid and current?

Response: The grazing permits were recently extended under the provisions of the 1995 Rescission Act, PL 104-19. Once this programmatic planning effort is completed, site-specific allotment management planning will be conducted to address the specific terms and conditions of the permits. Permit reissuance is outside the scope of the analysis and decision.

Letter Number *2 - Curlew DEIS* Comment ID 103

Comment: The areas (all vegetation and soil) around water systems have been devastated. Are these areas bound to the proposed utilization standards of 40-50 percent use? If these watering areas are in close proximity to a riparian area will there be a 6 inch stubble height standard?

Response: There will be some places where the utilization standards will not be met. We will measure use levels at key areas; these areas will be chosen using the protocol in the Range Analysis Handbook. By definition, key areas should be representative of the grazing use through out the unit. We do not choose sites where use will be excessive, nor those areas only slightly used (See Chapter 3, Livestock Grazing).

Letter Number *2 - Curlew DEIS* Comment ID 97

Comment: It is stated that the aum numbers will be developed in the Allotment Management Planning process. Pubic trust in government agencies is very poor these days, especially the Forest Service. This appears to be another "smoke and mirrors" ploy to keep aum's high at the expense of the resource. The aum numbers need to be developed and presented in the Record of Decision. Real on-the-ground aum reductions need to be listed in the Record of Decision. If allowed to be negotiated in the annual operating plans, reductions will not be realized. It should be a fairly simple task to calculate the allowable aum numbers and present those numbers to all stakeholders.

Response: Site specific livestock numbers are outside of the scope of this programmatic planning document. Those specific decisions would be made during the revision of the Allotment Management Plans (AMPs). The AMP revisions will be analyzed in a separate NEPA process. Site-specific analysis allows a more detailed look at the appropriate resource needs and mitigation that help establish an appropriate level of grazing. Regardless of permitted numbers, livestock will be moved when allowable use levels have been reached. In some years where drought conditions persist, such as 2000 and 2001, this could amount to a 20 percent reduction (M.Evans, pers. comm., 9/17/01).

This Grassland Plan is a programmatic guide to managing the Curlew National Grassland.

Letter Number *2 - Curlew DEIS* Comment ID 99

Comment: The DEIS does not list specific Utilization Standards and guidelines to be implemented and enforced. They need to be spelled out in simple language and enforced from year number one. No phase-in period should be allowed. The Forest must immediately implement upland utilization and riparian forage utilization standards and guidelines as well as riparian fences.

All actions (reductions in aum's and grazing standards) that are part of the EIS decision need to be implemented during year number one. If these decisions are allowed to be implemented gradually over 3-5 years, the healing of the land will never begin. First of all, within three years, Forest personnel will change and "new" personnel will need to be familiar with the Curlew National Grassland and that will stall the process. All changes must begin immediately.

Response: The utilization standards in the Grassland Plan will be incorporated into the grazing permits immediately after the Plan is final. Thus, during the next grazing season the livestock will be managed according to those standards. Then, within 3 years, the AMP's will be updated to include the utilization standards and other applicable direction from the Plan.

Category **Vegetation**

Letter Number *2 - Curlew DEIS* Comment ID 104

Comment: It appears the Forest is determined to target sagebrush under the guise of treating bulbous bluegrass. Most sage grouse experts agree that the optimum sagebrush canopy cover to facilitate a healthy sage grouse population is between 15 and 25 percent. The treatments described in this plan have hard targets on the over 15% canopy cover segment. This will be very harmful to sage grouse. If the Forest has as good of data as they profess, they should be able to micro manage these small tracts of remaining sagebrush.

It is suggested that an additional category for sagebrush canopy cover needs to be included. Having four (4) categories (0-5, 6-15, 15-25 and >26) would assist the Forest so they can target only the canopy cover that is not optimal for sage grouse. This would greatly benefit all users. However, it should be fairly simple to restrict the treatment areas that over over 25% canopy cover. Any treatment in the 15-25% category will undoubtedly have serious detrimental effects on all sagebrush obligates, especially the sage grouse population and should be excluded in any treatments until it surpasses the 25% cover limit.

Response: Data is available for four sagebrush canopy cover classes, however the 15-25 and >25% categories were lumped together in the sagebrush canopy cover analysis. The LRMP includes a guideline in the Wildlife Habitat section that gives higher priority to treatments of sagebrush in the greater than 25% canopy cover class.

Letter Number *2 - Curlew DEIS* Comment ID 106

Comment: When rehabilitating the treated areas, only native seed should be used. Crested wheatgrass is not a native species and should not be seeded. Crested wheatgrass does not benefit any of the wildlife species that are of concern here. Sagebrush seed should be included in this seed mixture.

Response: The treated areas have multiple land management goals. Species appropriate to meet the goals of a site-specific area will be used, based on our knowledge of the ecosystem, its processes, structure and function. In considering seed mixes on treated sites, we attempt to use plant species that will establish and maintain themselves over time.

Letter Number *2 - Curlew DEIS* Comment ID 105

Comment: To treat (burn and disc) a block of at least 500 acres of sagebrush is not in the best interest of any sagebrush obligates or any other wildlife species. This would create a monoculture block of whatever germinates. These big blocks reduce values for wildlife and specifically sage grouse. It is recommended that the targeted areas be less than 100 acres and only those areas with a canopy cover greater than 25%. Treating larger tracts will significantly decrease wildlife and resource values.

Response: Connectivity and fragmentation of habitats are discussed in Chapter 4 of the EIS. As explained, 320-acre patches were used as the minimum patch size needed for sagebrush dependent species. Larger treatment patches will result in larger patch sizes over time, while small treatments will result in smaller patch sizes over time. Treatment of 100-acre patches may result in future patches that are too small to be functional for some species of wildlife.

The LRMP includes a guideline to prioritize treatments in sagebrush with canopy cover greater than 25%.

Category **Comment Noted**

Letter Number *20 - Curlew DEIS* Comment ID 157

Comment: I feel at this time Alternative A is our best course of action and things are working at making constant improvements.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, provides a balance between human uses, such as livestock grazing, and wildlife needs in an adaptive framework that emphasizes focused monitoring.

Letter Number *20 - Curlew DEIS* Comment ID 153

Comment: It seems to me that your concerns are directed to the wildlife, especially sage grouse. I too believe that we should keep them in mind when we are doing practices to improve the grasslands. I also believe that the wildlife in the Curlew Valley are healthier and in good standings. To change things for their purposes may in fact backfire if you are trying to fix something that is not broke.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. Generally the decision maker chooses the alternative which best meets the Purpose and Need. The Record of Decision discloses and explains the reasoning behind his choice of alternatives.

Sage grouse habitat is one of the significant issues and according to NEPA, we must develop alternatives to address those issues. In addition, the NFMA requires that we maintain viability for wildlife species. Since sage grouse numbers west-wide are declining, the Forest must insure its management is not contributing to a loss of viability.

We believe Alternative H, the selected alternative in the Record of Decision, provides a balance between human uses, such as livestock grazing, and wildlife needs in an adaptive framework that emphasizes focused monitoring.

Category **Livestock grazing**

Letter Number *20 - Curlew DEIS* Comment ID 156

Comment: (Fences) become torn down and scatter all over becoming even more hazardous. Managing these fences are expensive and time consuming and is expected to be done only by permittees and not the people that think they are such a good idea. Fish and Game do not want to help pay or maintain these fences, once again the cost is left to the permittee where money and time is being stretched to the limit.

Response: We are aware of your concerns dealing with the cost of fence construction and maintenance. However, as documented in the records, the riparian conditons on the CNG are in less than satisfactory condition partly as a result of livestock grazing. Fencing them will provide for better management of permitted livestock; which will in turn improve riparian health anfd function.

Construction costs will be shared 50/50 between the Forest Service and the grazing association not soley borne by the permittee. While the cost of maintaining fences will increase, it may be less than the cost of managing the grazing to leave a 4-6 inch stubble on the creek.

Alternative H, the selected alternative in the Record of Decision, was developed in response to public comments. Alternative H reduces riparian corridor fencing to about five miles on those stream that will benefit from this type of management. All other perennial streams not currently in riparian pastures will be fenced into riparian pastures using existing fences where practical. Livestock grazing use will be determined based on the stream's condition.

Category **Riparian Areas**

Letter Number *20 - Curlew DEIS* Comment ID 155

Comment: In regards to fencing the riparian areas off I believe would cause the grass to choke itself in its own growth. It would be too thick and dense for a chick to get through or escape from danger. The fence itself would become a hazard for all wildlife getting in and out.

Response: The selected alternative (Alternative H) reduces riparian corridor fencing to only those perennial waterways (about five miles) that are considered to be "at risk" of achieving properly functioning condition. We believe focusing on those streams that could benefit from corridor fencing will result in more rapid improvement in these areas. Other riparian areas not currently fenced in riparian pastures and outside riparian exclosures would be fenced into riparian pastures using existing fences where feasible. Riparian pastures would be grazed, but utilization would be determined based on the condition of the stream. For exmple, those streams that are considered "not functioning" would be grazed very lightly, while those that are in properly functioning condition would be grazed to the degree that would maintain that condition. Specific utilization levels on specific areas will be established through site-specific AMP updates that will include a separate public involvement process.

If grass is untouched year after year, there is a potential for matting to occur. For this reason, livestock would be allowed to occasionally graze the riparian exclosures, no more frequently tha every 3 times in the decade on a controlled basis.

Effects of fences on sage grouse are discussed in the Wildife Habitat Management section in Chapter 4 under each of the alternative discussions. The guideline for the construction of new fence (General Habitat no. 3 in Connelly et al 2000) has been incorporated into the Grassland Plan and will be applied during site-specific planning.

Category **Wildlife**

Letter Number *20 - Curlew DEIS* Comment ID 154

Comment: Improving the fields I believe will only improve the grazing but will also keep a young stand of grass for sage grouse and other wildlife to feed on. I hear and read so many so called studies, each one saying the opposite of other. It makes me wonder which one can you follow. Maybe we should take a closer look at what we are all really doing. It seems to work if you consider the Fish and Game are trapping sharp- tail grouse to transport to other areas. Sage grouse numbers are up and seem to be doing well. With all that in mind, I feel as a permittee having to take a cut in the number of cattle to be allowed out on these fields in the Curlew Valley the only one who would not be doing well would be the permittee.

Response: Alternatives A and E analyze the effects of managing the Grassland for forage-producing species, primarily for livestock grazing.

The consensus among research wildlife biologists is that the reduction of sagebrush habitat, particulary sagebrush that features canopy cover in the 16-25% cover class, is the primary caus of declining sage grouse populations in sixteen western states. Other impacts, such as predation and loss of understory plant diversity, also may be factors in population declines. The federally-administered portion of the Curlew NG is one of the few remaining areas in southeast Idaho that supports sagebrush habitat to meet the needs of sage grouse. As private land undergoes conversion to agriculture or development, habitat on the Grassland becomes more significant in maintaining viable populations of sagebrush-dependent species.

Under current law the Idaho Fish & Game Department is responsible for managing huntable wildlife populations while the Forest Service is responsible for maintaining adequate quantity and quality of habitat, in cooperation with State Fish & Game, to meet huntable population objectives. Historically, the Forest Service has relied on population numbers provided by State Fish and Game surveys and monitoring efforts. Population numbers are estimates and while these estimates may not reflect the actual numbers of birds, some reasonable predictions can be made on the trends of a given population.

In reviewing IDFG monitoring information on sage grouse lek attendance, data indicate that based on mean number of male sage grouse per lek, when looking at the long-term trend over 20-30 years, sage grouse populations are on a downward trend over the Greater Curlew Valley Area. Because the CNG comprises only 9% of the GCVA and is broken into 3 distinct units, it is difficult to look at population trends on just the CNG. FS District lek attendance data and field observations suggest that while the mean number of males per lek has declined, the overall number of leks has increased.

Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

This issue has been addressed further in the Final EIS in Chapter 3, Appendix I and Appendix J.

Category **Vegetation**

Letter Number *21 - Curlew DEIS* Comment ID 18

Comment: I believe that the Caribou National Forest should consider refining the taxonomy of the sagebrush taxa being dealt with on the Curlew National Grasslands. I noticed throughout most of the impact statement references were made only to "sagebrush" and usually not even "big sagebrush." To develop a mutual understanding by all parties it is a necessity to cite specific taxa being discussed. This would also insure everyone that the specific ecological differences of each taxon were fully considered. That is an important issue everywhere "sagebrush" is being "managed." I found in Chapter 3 a mention that it was important to differentiate among sagebrush taxa, but it was several pages later before the common names of 5 "sage" taxa were cited. Unfortunately there is no differentiation among the 5 taxa elsewhere, as they are mentioned throughout the DEIS. Some great ecological differences exist among the 5 taxa mentioned.

Further, one taxon is referred to as sagebrush "X." That is not a taxon recognized today. Sagebrush "X" referred to variant discovered years ago and thought perhaps to be a cross between mountain and Wyoming big sagebrushes. I hope that you can be more specific regarding the plants you included in this taxon. On page 3-21 it is stated, "Wyoming sagebrush is not present on the grasslands." If that were the case, then what origin would a hybrid involvin Wyoming big sagebrush have arisen from?

Response: Chapter 3 of the FEIS lists the various sagebrush taxa and ecological differences between each. Basin big sagebrush and sagebush "X " (a big sagebrush subspecies that is more similar to mountain big sagebrush) are the most common sagebrush varieties on the Grassland. Collins and Harper identified the sagebrush "x" subspecies as Artemisia tridentata ssp. vaseyana (x) an is documented in "Habitat Types of the Curlew National Grasslands, Idaho" (1982). We recognize the need for more information on this sagebrush subspecies - what it is, its distribution and the ecological relationships to other species.

We are currently investigating opportunities with the Forest Service Intermountain Region to map sagebrush types on the Grassland, as well as the whole Curlew Valley.

Letter Number *21 - Curlew DEIS* Comment ID 21

Comment: I question the wisdom of plowing to get rid of bulbous bluegrass, as undesirable as it may be. Further, if you rid an area of bulbous bluegrass in this manner, you are at the mercy of finding adequate native seeds and obtaining their establishment. It may be difficult to obtain enough seed. If seed are obtained major problems remain in reestablishing shrubs with understory species. Many reclamation experiences have proven that it will be extremely difficult to obtain a near natural condition required by many wildlife species, some totally dependent on sagebrush, such as the sage grouse.

Response: Alternatives B,C and F would require 100% native seeds in any restoration efforts. Alternatives E, G and H (the selected alternative) would allow for a mixture of native and introduced species in any vegetation restoration. Seed companies are providing more native species every year as the emphasis on native species increases. Work at the Intermountain Shrub Lab in Provo, UT has proven that shrubs can reestablish with native and non-native understories. Experience fror the Grassland also shows that sagebrush will naturally reinvade crested wheatgrass sites and native sites within 10-20 years. (Pers comm - Ken Timothy). Obtaining a "near natural condition" has not been a goal on the Grassland. Based on the land use history of this area (see AMS, p12 17), we are not even sure we could achieve this.

Letter Number *21 - Curlew DEIS* Comment ID 20

Comment: The lack of consideration for the possibility of wildfire in the model is also a serious shortcoming. It is inconceivable that all wildfires will be arrested as the model is currently constructed. That means there will be a high potential for disruption of your plan through the natural occurrence of fire, particularly as you increase proposed disturbances to reduce bulbous bluegrass. These disturbances will probably result in more of a fire problem in the future than presently exists. Undoubtedly cheatgrass and other ecological equivalents will be enhanced by the disturbance.

Response: Areas burned by large wildfires would be evaluated on a site-specific basis and, if necessary, planned treatments may be reduced as needed to meet management goals and objectives in order to maintain the desired level of disturbance. (JL)

Wildland fires will never be completely eliminated from the Grassland. VDDT was used to estimate differences in the amount of sagebrush among alternatives, and was not intended to be an actual portrayal of fire behavior in the "real world". By necessity and by design all models are simplifications of reality. When wildland fires occur on the Grassland, site-specific analysis will determine the desirability of any future treatments. We have been very successful at controlling the introduction or spread of cheatgrass on the Grassland in the past, and fully expect that to continue in the future. -db-

Letter Number *21 - Curlew DEIS* Comment ID 19

Comment: I suggest you do expand your consideration of available knowledge in preparing your final decision. There are facts available regarding ecological trends and habitat requirements etc. of many plants and animals that are not properly considered in this DEIS. The deficiency is very apparent in the VDDT model utilized to render many of the DEIS conclusions.

Unfortunately, a number of the VDDT Model assumptions are not correctly based. For example, your first assumption is that succession will occur over a 30-year period to greater than 25% canopy cover of sagebrush. This may occasionally occur, but it is rare, especially where important game populations exist. I have measured this at a number of sites (and published results) and observed the same throughout my career in Idaho, Wyoming, and Montana. My data have been used to develop mathematical models that do explain successional patterns. Sagebrush (various taxa) do not expand canopy coverage at the rate suggested in your model.

Response: The FEIS states that "Monitoring information from past treatments and information from fire effects (Blaisdell, et al,1982; Bunting, et al,1987) indicate treated sagebrush sites on the Grassland in 0-5 percent canopy cover reach 15 percent canopy cover in 20 to 30 years." To move from one canopy class to another, an average of 10 years was used in the model. Chapter 4 also contains a discussion regarding the assumptions used in the VDDT model. (Also, refer to Appendix E for a full discussion of how the VDDT Model works.)

Approximately ten years is required to achieve the 6-15 percent canopy class from the 0-5 class 10 more years is required to achieve sagebrush canopy densities greater than 15 percent in basin and mountain big sagebrush types. An additional 10 years or more would be required to achieve canopy cover densities of 25 percent. These assumptions are based on information from site-specific monitoring and scientific literature stated above.

The VDDT model is one of many that could be used to model successional patterns. Information presented from this model should be viewed as an estimate of what results may occur based on treatments proposed in each alternative along with natural succession.

A model, no matter how complex, is merely a representation of reality and does not necessarily predict true on-the-ground conditions or results. The primary purpose of the VDDT model was to display approximate differences between the alternatives using a consistent method.

Letter Number *21 - Curlew DEIS* Comment ID 22

Comment: The use of herbicide treatment at several different rates to maintain canopy coverage of big sagebrush communities is also going to be very difficult. Herbicide effect will be different under spatial and temporal gradients that will be encountered. You should re-evaluate the question as to why you would ever want lesser canopy coverage of sagebrush. For instance, why would sagebrush canopy cover be reduced when the area is to be managed largely for a wildlife refuge? Wild ungulates, birds and a number of other species depend very heavily on sagebrush communities to meet habitat needs.

Response: Alternative H, the selected alternative, is a blend of features contained in Alternative f and Alternative G. Alternative H was developed to respond to public comments on the Draft EIS. It emphasizes the need to maintain the existing percentage of acres in each sagebrush canopy cover class over the ten-year plan period, using herbicides or mechanical methods. It includes direction to improve upland and riparian areas in the short-term while balancing use between livestock grazing and the needs of upland game birds, particularly Sage and Columbian sharp-tail grouse.

Herbicide treatments in areas that have greater than 25% big sagebrush canopy cover are designed to reduce, or thin the canopy cover to greater than 15% or to the 6-15 percent canopy cover class to maintain existing canopy cover classes over time. The benefits and effects to wildlife from implementing this alternative are found in Chapter 4 of the FEIS.

The use of herbicide allows the manipulation of sagebrush canopy cover to increase understory vegetation diversity. The grass and forb understory are important habitat components for many species; for sage grouse these components are critical for nesting cover, and foraging habitat during brood-rearing. Other types of treatments such as prescribed burning, may increase grass and forb diversity/abundance but result in the loss of the sagebrush canopy. This will generally make the stand unsuitable for nesting until the sagebrush is reestablished to around 15-25% canopy cover.

Category **Form letter**

Letter Number *23 - Curlew DEIS* Comment ID 331

Comment: Comments in this letter are the same comments as found in Letter #52, Please refer to letter #52 for comments and responses.

Response:

Category **Form letter**

Letter Number *24 - Curlew DEIS* Comment ID 332

Comment: Comments in this letter are the same comments as found in Letter #52, Please refer to letter #52 for comments and responses.

Response:

Category **Alternatives**

Letter Number *25 - Curlew DEIS* Comment ID 148

Comment: I feel it is important to take a more balanced approach to managing these lands; therefore, I support reducing cattle grazing as necessary to improve riparian and upland vegetation communities. The fact that an area has been grazed excessively for many years does not justify continuation of poor practices. While I understand that certain users are concerned about maintaining their 100+ year old "traditional lifestyle" of cattle grazing, I argue it is just as important to maintain for other users as myself, an even deeper-rooted lifestyle that involves hunting and wildlife watching.

Response: Alternatives in the DEIS were designed to be responsive to public issues and concerns.

Based on public comments on the DEIS, the ID Team developed Alternative H, the selected alternative. This alternative would maintain the current percent of acres in each sagebrush canopy over class over the 10-year plan period through a variety of vegetation treatments. In addition, upland utilization levels would be established at 50 percent grassland-wide with further refinement in Allotment Management Plan updates. Corridor fencing would be reduced and applied only on "at risk" streams (approximately 5 miles) that would benefit from fencing. The remaining perennial streams would be fenced into riparian pastures using existing fences where feasible. Riparian livestock utilization would be determined based on the properly functioning condition of the stream. Those streams that are non-functioning would be grazed using light utilization standards, while those streams in properly functioning condition would be grazed at a level that maintains properly functioning condition. (LW)

Category **Comment Noted**

Letter Number *26 - Curlew DEIS* Comment ID 313

Comment: Eliminate livestock grazing.

Response: Alternative D proposes to remove livestock from the Curlew National Grasslands. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. Generally the decision maker chooses the alternative which best meets the Purpose and Need. The Record of Decision discloses and explains the reasoning behind his choice of alternatives.

Alternative H, the selected alternative in the Record of Decision, allows livestock grazing to continue and implements adaptable livestock utilization levels for uplands and riparian areas.

Letter Number *26 - Curlew DEIS* Comment ID 314

Comment: End the use of off-road vehicles and snow machines.

Response: Each of the alternatives addresses motorized and over-the-snow travel. See Chapter 2, EIS, "Alternative Descriptions."

Alternative H, the selected alternative in the Record of Decision, would restrict motorized travel to designated routes year-round. During the snow season, the Grassland would be open to over-the-snow vehicles.

Letter Number *26 - Curlew DEIS* Comment ID 311

Comment: Preserve Sweeten Pond and all tree rows.

Response: Thank you for your comment. Sweeten Pond and the tree rows are protected in all alternatives.

Letter Number *26 - Curlew DEIS* Comment ID 306

Comment: The CNG contains impressive biological and scenic attributes of national significance. May I suggest that this grassland be established as a National Wildlife, Fish and Plant Sanctuary Preserve Wilderness.

Response: Alternative D reflects your suggestion. See description of Alternative D in the Alternative Descriptions" section in Chapter 2 of the EIS.

We believe Alternative H, the selected alternative in the Record of Decision, provides a better balance between human uses, such as livestock grazing, and wildlife needs. It uses an adaptive framework with emphasis on focused monitoring. This alternative continues to provide for multiple uses and the sustained yield of goods and services for the American public who own these lands.

Letter Number *26 - Curlew DEIS* Comment ID 307

Comment: Fully preserve all roadless areas of 160 acres and larger and designate the same as wilderness.

Response: Thank you for your comment; however, there are no Roadless Areas on the Curlew National Grassland.

An alternative which would create a Preserve was considered but dropped from further analysis The rationale is discussed in Chapter 2 of the EIS in the section "Alternative Considered But Dropped From Further Analysis." Primarily, the CNG is a severely altered landscape which is dominated by non-native vegetative communities. It is important to know that resources were drastically altered prior to acquisition of this area by the government.

Category **DEIS**

Letter Number *26 - Curlew DEIS* Comment ID 308

Comment: [The CNG] should be designated a Research Natural Area.

Response: This alternative was considered but dropped from further analysis. See DEIS Chapter 2, page 2-33 under "Research Mandate for Sustainable Agriculture."

Primarily, the CNG is a severely altered landscape which is dominated by nonnative vegetative communities. These resource conditions, based on the current and past management, are depicted in the Affected Environment of the DEIS. Research Natural Areas (RNA), on the other hand, are to be relatively unaltered landscapes of native communities. While the CNG is a unique landscape, it would not be appropriate to designate it as an RNA.

Category **Lands**

Letter Number *26 - Curlew DEIS* Comment ID 309

Comment: Acquire in-holdings.

Response: The Grassland Plan includes a goal under the heading "Lands and Special Uses" the first goal states that "Adjustments in landownership are made through the sale and/or exchange to facilitate administration of Federal lands." Under Standards and Guidelines, the first standard states, "Land acquisitions, exchanges, and rights of way will be in compliance with current National policy and for the purpose of consolidation and improving management."

All land acquisitions and/or exchanges are analyzed at the site-specific NEPA level. One such land exchange was recently completed. The Oneida County Exchange will transfer ownership o an inholding from Oneida County to the Forest Service.

Category **Riparian Areas**

Letter Number *26 - Curlew DEIS* Comment ID 310

Comment: Establish conservation program for all riparian and wetland areas.

Response: All riparian and wetland areas have established zones of special emphasis termed Riparian Wetland Areas (RWA). RWAs have defined, specific areas established, depending on the presence of fish (See Grassland Plan, Riparian/Wetland Areas Section). Also, goals and management direction for RWA are stated in Chapter 4 in the Riparian/Wetland prescription.

Category **Vegetation**

Letter Number *26 - Curlew DEIS* Comment ID 312

Comment: Restore [CNG] to native plants and animals.

Response: In the FEIS, Chapter 2, Alternative X - Restore Grassland to Native Plant and Animal pre-settlement Conditions - was an alternative that was considered but dropped from detailed analysis. The discussion under this section outlines the rationale as to why this alternative was dropped.

The goals of the Curlew Grassland Plan include maintenance and/or restoration of native and desired non-native plant communities and wildlife populations.

Category **Alternative G**

Letter Number *27 - Curlew DEIS* Comment ID 451

Comment: - "Within three years of signing the ROD, allotment management plans will be updated..." (DLRAP p. 3-12). Thus, earliest possible changes in grazing practices or forage utilization may occur in 2004. Given (DEIS p. 4-29): "Residual vegetation at this (60 percent] rate would not provide sufficient cover for most ground-nesting birds (Boclk, et al, 1993) reduced grazing utilization standards should be implemented in the first grazing season following publication of the ROD in order to correct on-going adverse impacts to watershed and wildlife resources.

- Pro-livestock/anti-wildlife brush treatments will commence immediately.

- Riparian fencing will be done within 5 years of the ROD signing (DLRAP p. 4-4), if funded. Riparian fencing is prioritized after monitoring, about which DLRW p. 5-6 advises: "It is unlikely that annual budgets will fully fund the monitoring effort..."

Response: Please refer to Chapter 2 in the EIS under the section "Elements Common to All Alternatives, " a budget feasibility analysis was completed and base level funding was prioritized as follows:

1. Grazing allotment administration
2. Priority 1 monitoring
3. Riparian restoration (fencing or improvement projects)
4. Vegetation treatments and other improvement projects such as ponds or tree rows.

Livestock use levels from the Plan will be incorporated immediately into the grazing permits. As specified in the FSH, livestock will be moved when use is met. There will not be a five-year lag time as suggested by the comment.

Residual vegetation at the prescription level was evaluated on a ID Team field trip (9/01). This analysis is described in the FEIS in Chapter 3 under the Wildlife habitat Management section.

Category **Alternatives**

Letter Number *27 - Curlew DEIS* Comment ID 450

Comment: Unbalanced DEIS and DLRMP proposed actions and mitigation do not bode well for wildlife. The Forest's preferred course of action will continue maximized livestock grazing and brush treatments, defer meaningful management change and resource improvement, while implementing actions benefiting watershed, soil, and wildlife resources "if funded".

Response: Based on public comments on the DEIS, the ID Team developed Alternative H, the selected alternative. This alternative would maintain the current percent of acres in each sagebrush canopy over class over the 10-year plan period through a variety of vegetation treatments. In addition, upland utilization levels would be established at 50 percent grassland-wide with further refinement in Allotment Management Plan updates. Corridor fencing would be reduced and applied only on "at risk" streams (approximately 5 miles) that would benefit from fencing. The remaining perennial streams would be fenced into riparian pastures using existing fences where feasible. Riparian livestock utilization would be determined based on the properly functioning condition of the stream. Those streams that are non-functioning would be grazed using light utilization standards, while those streams in properly functioning condition would be grazed at a level that maintains properly functioning condition.

Using adaptive management strategies and focused monitoring, we should be able to better understand the effects of management activities on wildlife, riparian areas and livestock grazing and make timely adjustments.

Letter Number *27 - Curlew DEIS* Comment ID 447

Comment: - While we appreciate industry pressures to continue maximum grazing, the EIS should explore how moderate CNG stocking rates could improve ranch profitability by increasing calving percentage and weaning weights (see Holechek 1998:198).

Response: This is outside the scope of the analysis. Providing a moderate level of grazing will allow livestock grazing to continue while maintaining vegetation resources to meet other resource needs and uses. The Forest Service manages these resources to attain a desired condition that provides for sustained yield and multiple uses. Based on well-defined desired resource conditions, livestock operators then must decide how best to produce a profitable, long-term operation through the manipulation of calving seasons, weaning weights, etc.

Category **Comment Noted**

Letter Number *27 - Curlew DEIS* Comment ID 442

Comment: IWF recommends immediate implementation of Alternative C's:

-Upland and riparian forage utilization Standards and Guides.

-Riparian fencing

Response: Thank you for your comment. What your comment suggests is blending components of Alternative G and C into a modified alternative. Alternative C does not propose riparian fencing, and in Alternative G utilization levels are slightly higher than those proposed in Alternative C.

The deciding officer has the flexibility to modify or create new alternatives based on public comments on the Draft EIS and Draft Plan. Your suggestions will be considered. Alternative H, the selected alternative in the Record of Decision, is a combination of alternatives F and G. It was developed in response to public comments on the Draft EIS. Alternative H uses adaptive management strategies and focused monitoring to help us understand how management activities and uses affect Grassland resources. It incoporates livestock utilization levels, annual monitoring of key areas, and annual livestock utilization mapping. Riparian corridor fencing would be installed on streams that are assessed to be "at risk" of properly functioning condition to accelerate stream recovery. All other perennial streams not currently fenced into riparian pastures would be fenced into riparian pastures using existing fences where practical. Livestoc utilization in riparian pastures would be established based on the PFC status of the stream in that pasture.

Category **DEIS**

Letter Number *27 - Curlew DEIS* Comment ID 477

Comment: DEIS p. 4-158: Other reasonably foreseeable actions:

- Sage grouse being listed as a Region 4 Sensitive species in 2001.

- One or more R-4 Sensitive plants or animals being found on the Grassland.

Response: Sage grouse and other identified species-at-risk and their habitats have been addressed through conservation measures, which have been incorporated into Forest Plan guidelines. Species-at-risk were identified through several sources (Process Paper) and have been coordinated with th R4 Species-at-risk list. Any new R4 Sensitive Species will probably be on this list and have been addressed in this analysis.

If new species or habitat conservation measures are identified that have not been incorporated into the Plan, they will be incorporated at that time. The Plan includes a goal to proactively manage habitats for sensitive species to preclude listing under ESA.

Past, present and reasonably foreseeable actions which could contribute to cumulative effects generally refer to management actions. These suggestions are actions which could lead to more intensive analysis but will not have cumulative effects on CNG resources.

Category **Livestock grazing**

Letter Number *27 - Curlew DEIS* Comment ID 463

Comment: DEIS p. 3-60-62: "Rangeland Capability and Suitability' fails to consider:
- Latest NRCS productivity data from Oneida County Soil Survey
- Inadequate ground cover
- Areas >I mile from water are grazed, but only after forage closer to water has been excessivel grazed, so should not be included in grazing potential

Forage production estimates in the 1982 allotment management plans should be discussed as they are the most recent, complete on-ground data set. Using incorrect application of R-4 Range Analysis Handbook guidelines, the 1982 Curlew allotment capacity over-estimate was 18,597 AUMS, cautioning "if revegetation practices cannot continue ... the obligation will have to be reduced accordingly" (AMP p. 6). The 1982 Buist AND similarly over-estimated grazing capacity at 3,646 AUMs (AMP p. 1). Correct application of R-4 Range Analysis Handbook curve table "Exhibit 31.2&' indicates Curlew allotment grazing capacity was 1 1,73 1 HM (IWF publication 1998). Similarly, Buist allotment capacity was 2,300 HM. These combined estimates according to R4 Range Analysis Handbook guidelines indicate Grassland grazing capacity was (is?) 14,031 HM -- 7,449 (35%) less than the presently and historically permitted 21,480 HM (DEIS p. 3-59).

Response: None of the three items you mention are incorporated in the Intermountain Region's protocol for determining rangeland capability and suitability during management plan revisions (See Appendix F for criteria).

Productivity is not considered a component of rangeland suitability, however it is considered a component of capability. Capability is an assessment of the biophysical characterisitcs of an area that helps determine if the land is capable of sustaining livestock grazing. The criteria evaluated are discussed in Appendix F of the EIS. All the land within the CNG was determined to be capable of supporting livestock grazing. Suitability considers the appropriateness of livestock grazing on a particular area based on the economic and environmental consequences and considerations for other uses that may be affected by grazing. See Appendix F for a more through discussion of capability and suitability.

The Range Analysis direction used in the development of the 1982 AMP clearly states that the tentative capacity estimates are "experimental" capacities that shoud be firmed up by actual use studies. Refer to 12/81 REA Handbook.

Although historic use data is important, it is not essential to a reasoned decision. The trend in the uplands on the Curlew has been upward. Thus, a lower use rate may speed that rate up, at least on native range. Also, since actual use--the amount of time the livestock are actually in the unit--is based on the allowable use and varies each year, the historic use levels become less important. The Curlew Monitoring Plan sets criteria for monitoring and documenting actual use.

Letter Number *27 - Curlew DEIS* Comment ID 466

Comment: DEIS p. 3-84: "The Grassland has the potential to produce forage sufficient to support approximately 22,639 head months [of grazing] at a 60 percent forage utilization level." Given the sad state of soil, vegetation, and wildlife resources the DEIS overestimates potential grazing by not using procedures "based upon theoretical approaches or research methods generally accepted in the scientific community" (40 CFR 1502.22(4)), thus misleading readers.

Response: Appendix G describes in detail the methods used to calculate a range of potential head months by alternative. These methods are all accepted according to the Range Analysis Handbook 2209.11. A discussion and table In Chapter 3 of the FEIS under the Livestock Grazing section discuss and display existing average production per year on native, crested wheatgrass and bulbous bluegrass sites. The EIS is quite clear about how production calculations were developed and states that "production figures do not represent absolute peak biomass production, nor do they account for additional fall growth. They do not represent absolute production values or the range of productivity for a given site due to climate or site-specific conditions. These data are not to be used for stocking rate determination without other supporting data and site-specific analysis."

A second table in this same section displays a second calculation for estimated forage production under three sagebrush canopy cover classes. Again, the EIS is quite clear and definitive in that it states that "it should be understood these calculations are very general and provide only estimates. Capacity and stocking levels may vary by allotment, based on site-specific conditions that are not reflected in the calculation. Computations of potential head months should not be used or extrapolated to establish stocking levels or capacity without site-specific analysis."

The range of estimated head months for each alternative were primarily intended to display differences between alternatives for comparsion.

Alternative H, the selected alternative in the Record of Decision, proposes an average 50 percent use level grassland-wide which would likely improve conditions since it is lower than the current use level of 60 percent.

Letter Number *27 - Curlew DEIS* Comment ID 468

Comment: DEIS p. 4-4: The fact that cattle grazing causes "areas around watering loitering, and salting areas [to average] significantly less than 40 percent" ground cover, makes these sites unsuitable for grazing.

Response: These sites are not unsuitable for grazing as defined by the Range Analysis Handbook. Areas around artificial watering sites such as water troughs and stock ponds are not subject to the standards set forth in the soil disturbance or ground cover standards, because they are not key areas. They are usually extremely small lin extent (less than .10 acres) and if soil is moving, mitigation would be used to reduce impacts. Also, the ground cover and soil disturbance standards for uplands are examined on a larger scale or analysis area, such as a pasture as in the case of the CNG.

Letter Number *27 - Curlew DEIS* Comment ID 469

Comment: DEIS p. 4-4: CNG's deteriorated soil, watershed, and wildlife conditions refute the DEIS statement "Livestock utilization levels that are light to moderate (less than 60% utilization) do not substantially affect overall watershed stability, runoff rates, or erosion." If the DEIS statement is true, grazing utilization has certainly been more than 60%.

Response: Most of the vegetative and stream conditions on the Grassland are, indeed, due to past management. This management includes plowing and farming in the 1920's and 1930's; erosion during the great dust bowl; reseeding to monocultures on non-native species; stream dewatering for irrigation, etc. Current livestock use levels are quite minor in determining the overall condition of the Grassland. Still, Alternative H, the selected alternative in the Record of Decision, proposes to lower livestock utilization levels, particularly in areas improtant for nesting sage grouse (See FEIS, Chapter 3, General Description, and Chapter 2, Alternative H description.)

Letter Number *27 - Curlew DEIS* Comment ID 490

Comment: The 3 guesstimates erroneously assume 60% forage utilization. Curlew Grassland forage consumption is usually excessive. The DEIS should not present a degree of forage consumption unsupported by studies in Ranger District records.

Response: The calculations in the EIS are not "guesstimates." They are estimates based on research, expert opinion and field data.

Appendix G in the EIS discusses the assumptions and methods use to calculate potential forage production at the programmatic scale. Forage production was used to calculate potential head months based on treatments and utilization levels proposed in each of the alternatives. The EIS is clear that these computations are only estimates to provide for a comparison between alternatives at the programmatic scale. Potential forage production and potential head months displayed in the EIS were never intended to set allotment capacity nor permitted livestock numbers.

As described in Appendix G, the first method used to calculate forage production relied on transect information from District records. It should be noted that transect data were dated, therefore additional calculation methods were used which resulted in an estimated high, medium, and low potential for forage production. Again, these computations were intended to display differences between alternatives rather than set permitted numbers in this programmatic EIS.

Production estimates represent a starting point. Livestock will be moved or removed when the use limit has been met. On drought years such as 2001, that could mean a significant reduction in Head months. A field review in 2001 validated use averaged 50 percent in the 10 percent of fields the ID Team visited (IDT Field Notes, 2001).

Letter Number *27 - Curlew DEIS* Comment ID 491

Comment: 7. Knowledgeable range managers would intuitively test DEIS production guesstimates of this semi-desert range with common-sense analyses, such as:

How reasonable is it to graze 1 AUM per 2.3 acres (20,477 AUMs in CY2000 on 46,600 acres) on "low precipitation - less than 12 inches per year" (DEIS p. 3-13) rangeland and meet multiple use objectives?

Response: Although your general "rule of thumb" can be used to establish a general number of livestock for a given area, the Grassland is a highly altered landscape. More than 35,000 acres have been plowed and seeded to introduced species. Your "rule of thumb" would be more appropriate in a more native rangeland environment rather than the altered landscape of the Curlew NG.

Almost 75 percent of the capable and suitable land within the Grassland boundary is crested wheatgrass. Crested wheatgrass, an introduced species, is one of those that Holechek would describe as highly adapted to grazing. Almost all of the key sites (where utilization monitoring occurs) lie within the crested wheatgrass community. Based on an eleven year study in Utah (Grazing Intensities and Systems on Crested Wheatgrass in Central Utah: Response of Vegetation and Cattle, Tech Bull #1388) researchers evaluated the vegetation response and the cattle response under different grazing intensities and rotations. Their recommendation was that "crested wheatgrass used for spring grazing in the intermountain region should be managed under a rotation system utilizing about 65% percent of the herbage produced." This was considered to be a moderate level of use for crested wheatgrass. The light level was 53%. Other studies (Horton and Weissert) support grazing crested wheatgrass heavier than native species.

With low use levels on crested wheatgrass sites, grazing is very uneven; some plants are totally grazed while other plants are left untouched. The untouched "wolf" plants become coarse and unpalatable. After many years, the ungrazed plants lose vigor and the undersoty becomes very patchy. (See FEIS, Chapter 3, Disturbances, Crested Wheatgrass). The remaining 25 percent of the Grassland is a native bunchgrass type. These area are in the more rugged terrain that was not plowed. Due to the topography and distance from water, it is unlikely that utilization would reach 40% on this sites before the 50% use level is met on crested wheatgrass. Thus, livestock would probably be moved at much lower use levels.

Letter Number *27 - Curlew DEIS* Comment ID 462

Comment: DEIS p. 3-59: DEIS statement "If any of the groups meet the 60% utilization rate in all their pastures prior to the end of the grazing season, they come off the grassland. " is untrue. Upland grazing utilization standards are not mentioned in 1989-1994 Annual Operating Plans. After 1995, Operating Plans direct permittees to move cattle when "60% use or less use has been reached on Crested Wheat Grass" -- without reference to benchmark areas. In mixed forage pastures, 60% use of crested wheatgrass occurs after significantly higher consumption has bee made of more palatable forage plants. Ranger District files contain no valid record of post-grazing utilization checks over the 1988-2000 period. Agency records are thus insufficient to provide a basis for the DEIS claim of 60% use, a requirement of the 1982 Allotment Plans. The DEIS thus fails to inform what actual CNG forage utilization has been or provide a basis for informed decision making as to desired future utilization levels. The DEIS should correctly state "There are insufficient records to document past grazing utilization on the Grassland."

Response: The Grassland is a highly altered landscape. More than 35,000 acres have been plowed and seeded to a variety of introduced species, primarily crested wheatgrass. The remaining 12,000 acres were not plowed or seeded and are comprised of native bunchgrass types.

During September of 2001 the ID Team conducted a field review on the Grassland. The team determined use levels on several different fields. Average use was 50% by weight and the average stubble height was five inches. While your statement is correct that the Forest lacks "hard" utilization data from the past and range managers have relied on ocular estimates, the Grassland Plan contains an expanded monitoring program that includes priority one utilization mapping and other actual use montiroing (See Chapter 5 of the Grassland Plan).

Although historic use data is important, it is not essential to a reasoned decision. The trend in the uplands on the Curlew has been upward. Thus, a lower use rate may speed that rate up, at least on native range. Also, since actual use--the amount of time the livestock are actually in the unit--is based on the allowable use and varies each year, the historic use levels become less important. The Curlew Monitoring Plan sets criteria for monitoring and documenting actual use.

Letter Number *27 - Curlew DEIS* Comment ID 494

Comment: DEIS Appendices F- I thru G and dependent guesses as to grazing capability and use at DEIS page 4-42 thru 43: We have little faith in production estimation procedures, which lack measured data. As Lyle (DEIS Appendix G-14) states, "No recent production data is available on either seeded sites or native sites for the Grassland. (See their chart in letter on forage production on three fields)

- 1982 Allotment Plans indicate 1,200 pound/acre actual maximum forage production considerably less than DEIS estimates in Appendix G and especially the 1,800 lb. estimated at DEIS p. 4-42.

- Guesstimates highlight their not including fall regrowth. Fall forage regrowth is not consistently present on the Grasslands.

- No estimate is made of low forage production in drought years. Mathematically, western rangelands receive less than average precipitation 50% of the time. Although not practiced on the Curlew Grassland, range management texts and professionals advise grazing the cattle numbers cattle which ranges will support in years with below average rainfall.

- All three DEIS forage production guesstimates are of peak, mid-summer forage production. None factor in April 16 turn-out grazing, when forage plants have barely started growing; or late season, mid-November grazing, when much production has disappeared due to wind, grasshoppers, etc., and dry straw remains.

Response: The calculations in the EIS are not "guesstimates." They are estimates based on research, expert opinion and field data.

Appendix G in the EIS discusses the assumptions and methods use to calculate potential forage production at the programmatic scale. Forage production was used to calculate potential head months based on treatments and utilization levels proposed in each of the alternatives. The EIS is clear that these computations are only estimates to provide for a comparison between alternatives at the programmatic scale. Potential forage production and potential head months displayed in the EIS were never intended to set allotment capacity nor permitted livestock numbers.

As described in Appendix G, the first method used to calculate forage production relied on transect information from District records. It should be noted that District transect data were dated; therefore, two other methods of calculating forage production were used to provide a high medium, and low range of forage production which in turn resulted in a range of potential head months by alternative. Again, the EIS is clear that these calculations were used to display differences between the alternatives and were not intended to set permitted numbers or determine grazing capacity on individual allotments without further site-specific analysis.

Production estimates do not determine actual use. The permitted numbers are merely a starting point. Once the use level is met, cattle are moved to another pasture or they leave the Grassland. Furthermore, the use standards are for the end of the grazing period, not the grazing season. Thus, even if regrowth may be expected later in the year, livestock would be removed once the allowable use level is met.

Letter Number *27 - Curlew DEIS* Comment ID 465

Comment: DEIS p. 3-79: "No studies are available that correlate utilization levels with residual vegetation stubble height at this time" selectively ignores:

- DEIS Table 3.11 (p, 3-43) indicating 60% forage utilization leaves inadequate grouse nesting cover

- Use of USFS Utilization Gauge (R4 FSH 2209.21 R4 Range Analysis Handbook 1986, 4.22f), which accurately predicts stubble height at various utilization levels.

Response: Based on an eleven year study in Utah (Grazing Intensities and Systems on Crested Wheatgrass in Central Utah: Response of Vegetation and Cattle, Tech Bull #1388) researchers evaluated the vegetation response and the cattle response under different grazing intensities and rotations. Their recommendation was that "crested wheatgrass used for spring grazing in the intermountair region should be managed under a rotation system utilizing about 65% percent of the herbage produced." This was considered to be a moderate level of use for crested wheatgrass. The ligh level was 53%. Other studies (Horton and Weissert) support grazing crested wheatgrass heavi than native species.

Forest Service direction is found in the Planning Deskguide. Under a rotation system that is in satisfactory condition, up to 65% of current year's growth is an acceptable level of use as long a the desired future conditions are being met and ecosystems are maintained or improved.

Monitoring on key areas will be such that we can meet the standards and guidelines established in the plan over most of the area.

In a field review of the Grassland, the IDT found that with 40 to 50% utilization, the average stubble height was five inches. The measurements were taken using average leaf height, not counting seed stalks so they are conservative. Further, there were very few early season forbs remaining. These could contribute to a higher understory stubble in the spring when it is important for sage grouse. Since the CNG has been experiencing a severe drought for the past several years, it is likely that on an average moisture year the seven inches of nesting cover would be met in many areas. This issue is further discussed in the Wildlife section of the EIS.

Alternative H was developed to respond to sage grouse nesting concerns also. A guideline in the Grassland Plan directs land managers to establish lowe use levels in important sage grouse nesting habitat.Almost 75% of the capable and suitable land within the CNG boundaries is crested wheatgrass. Almost all of the key sites (where utilization monitoring occurs) lie within the crested wheatgrass community.

The Grassland Plan includes a guideline for lower use levels in sage grouse nesting habitat and higher levels in crested wheatgrass fields. According to the EIS, this would provide improved grouse nesting and brood-rearing.

Letter Number *27 - Curlew DEIS* Comment ID 493

Comment: DEIS p. G-3: The assumption that forage production begins decreasing at 2.5 percent sagebrush canopy is contradicted by Winward on p. G-5.

Response: Forage production was caluclated using three different methods as described in Appendix G. Each calculation should be considered separate. No correlation should be made between the three calculations. Only one research literature cite (Hull and Klomp) was found that provided some site-specific information on forage production under sagebrush canopy cover. The Hull and Klomp research was used in the third production calculation based on research around Holbrook, Idaho in 1972.

The first method used District transect data and used work by Rittenhouse and Sneva (1976) and Robert Kindschy in "Crested Wheatgrass in the Ecosystem" that suggests that a 4 percent decline in production occurs for every 1 percent increase in sagebrush canopy cover. For conservative estimates, a factor of 4.5 percent was used rather than the four percent suggested

The second method relied on the expert opinion of Dr. Alma Winward, USFS Intermountain Region, Regional Ecologist.

The result of all three forage calculations and subsequent estimation of head months yielded a high, medium, and low range for production and range of potential head months. The EIS is clear that these calculations were used to show differences between alternatives and were not intended to establish permitted use or grazing capacity.

Letter Number *27 - Curlew DEIS* Comment ID 443

Comment: The DEIS' proposed upland grazing utilization of "40-50%" (p. 5) is not supported by modem range science, Forest Service direction, or CNG watershed conditions. IWF recommends immediate implementation of 30-40% forage utilization in sagebrush-bunchgrass types as recommended by Holechek (I 998:207). He (I 991:14) observes:

A 50% use level works well in the flat, humid regions of the Great Plains and Southeast because of their high productivity and high adaptability of the plants to grazing. However in most cases it causes range destruction in the rugged, and ranges of the West. Research shows stocking rate that involve a 30 to 40% forage use level will enhance range recovery, maintain adequate food and cover for wildlife, protect soil resources and will give the highest long term economic returns with the least risk on nearly all of the western range types.

- Fifty percent utilization is Region 4's "Plant Community Standards and Guides" maximum herbaceous use level for rotation grazing uplands in unsatisfactory condition. Current management maintains inadequate ground cover on most of the Grassland. The DEIS provides many other reasons to reduce grazing to land capability.

Response: The Grassland was at one time under private ownership and intensively farmed. The topography of the Grassland is not characterized by "rugged" terrain.

Almost 75 percent of the capable and suitable land within the Grassland boundary is crested wheatgrass. Crested wheatgrass, an introduced species, is one of those that Holechek would describe as highly adapted to grazing. Almost all of the key sites (where utilization monitoring occurs) lie within the crested wheatgrass community. Based on an eleven year study in Utah (Grazing Intensities and Systems on Crested Wheatgrass in Central Utah: Response of Vegetation and Cattle, Tech Bull #1388) researchers evaluated the vegetation response and the cattle response under different grazing intensities and rotations. Their recommendation was that "crested wheatgrass used for spring grazing in the intermountain region should be managed under a rotation system utilizing about 65% percent of the herbage produced." This was considered to be a moderate level of use for crested wheatgrass. The light level was 53%. Other studies (Horton and Weissert) support grazing crested wheatgrass heavier than native species. (Refer to Chapter 3, Disturbances, Seedings, Crested Wheatgrass for more information.)

With low use levels on crested wheatgrass sites, grazing is very uneven; some plants are totally grazed while other plants are left untouched. The untouched "wolf" plants become coarse and unpalatable. After many years, the ungrazed plants lose vigor and the undersoty becomes very patchy. (See FEIS, Chapter 3, Disturbances, Crested Wheatgrass). The remaining 25 percent of the Grassland is a native bunchgrass type. These area are in the more rugged terrain that was not plowed. Due to the topography and distance from water, it is unlikely that utilization would reach 40% on this sites before the 50% use level is met on crested wheatgrass. Thus, livestock would probably be moved at much lower use levels.

Forest Service direction is found in the Planning Deskguide. Under a rotation system that is in satisfactory condition, up to 65% of current year's growth is an acceptable level of use as long a the desired future conditions are being met and ecosystems are maintained or improved.

Grassland watershed conditions are not solely a result of current grazing practices. The whole watershed, including the headwaters on private land, needs to be assessed. Downcutting has occurred over the past 100 years of settlement in the valley, and some of the downcutting continues to be a management problem on lands other than the Grasslands. Maintaining a residual plant cover with appropriate amounts of litter is part of the desired condition on the Grassland.

In Alternative H, the selected alternative in the Record of Decision, use levels may be less than 50 percent in native understory sties and those most important for sage grouse nesting habitat.

Letter Number *27 - Curlew DEIS* Comment ID 444

Comment: - The FS Handbook curve table "Exhibit 3 1.2B", enclosed and shown in our joint publication "Riparian Survey of Curlew National Grasslands - 1997" supports lighter grazing. That curve table indicates proposed 500/o utilization of Crested wheatgrass allows 27% usage of D&I species. Similarly, proposed 40-50% use of native species indicates 24% allowable use of D&I plants. Moderate grazing per this curve table developed from agency experience will enable other resource outputs.

Response: This table was not produced for crested wheatgrass and cannot be used in crested wheatgrass Crested wheatgrass is planted in pure stands and effectively outcompetes native species, because of the lateral root system and the early green-up in the spring (Crested Wheatgrass Complex - 2/99; internet, Introduced Forage Grasses- R.D. Harrison, N.J. Chatterton, R.J. Page, K.H. Asay, K.B. Jensen and M. Curto). Very few native species have reinvaded these crested wheatgrass stands. Therefore, crested wheatgrass is our key or desired species and the one f which the grazing level needs to be set. Research indicates that 65% use is moderate for crested wheatgrass stands.

Letter Number *27 - Curlew DEIS* Comment ID 445

Comment: - If not adjusted downwards per "Exhibit 31.2B", the proposed 40-50 percent upland utilization precludes maintaining seven inches of sage grouse nesting cover.

Response: Monitoring on key areas will be such that we can meet the standards and guidelines established in the plan over most of the area.

In a field review of the Grassland, the IDT found that with 40 to 50% utilization, the average stubble height was five inches. The measurements were taken using average leaf height, not counting seed stalks so they are conservative. Further, there were very few early season forbs remaining. These could contribute to a higher understory stubble in the spring when it is important for sage grouse. Since the CNG has been experiencing a severe drought for the past several years, it is likely that on an average moisture year the seven inches of nesting cover would be met in many areas. This issue is further discussed in the Wildlife section of the EIS.

Alternative H was developed to respond to sage grouse nesting concerns also. A guideline in the Grassland Plan directs land managers to establish lower use levels in important sage grouse nesting habitat.

Letter Number *27 - Curlew DEIS* Comment ID 446

Comment: - Tens of thousands of public dollars have been invested on the CNG to seed more palatable grasses and forbs -- Russian wild rye, alfalfa, small burnet, etc. -- to improve range and wildlife habitats. If not adjusted per Exhibit 31.2B, the DEIS' excessively high 40-50 percent utilization rates ensure >50 percent use of more palatable plant species. Proposed utilization levels will reduce frequency and abundance of these plants, wildlife and livestock forage quality and quantity, and the years over which benefits from public investments in bums, seedings, chainings, etc. are recouped.

Response: You are correct in saying that public dollars have been invested in the CNG and almost all of it was to improve the grazing resource for the local dependent ranchers. Over the last twenty years robust forage species have been seeded that were desirable to livestock and that could withstand the harsh, high-desert climate. Most of the plants you mention were planted with crested wheatgrass to provide some variety to wildlife as you suggest (Handy, 1954). However the reality of the situation is that livestock typically prefer these desirable plants and most are quickly grazed out. In addition, they were planted at a much lower percentage in seed mixes than crested wheatgrass giving the competitive advantage to the wheatgrass.

In Alternative H, the selected alternative in the Record of Decision, attempts to account for variability by establishing an average 50 percent utilization level on a grassland-wide basis. Some areas, such as pastures dominated with crested wheatgrass could be grazed at higher utilization levels, while native understory sites or areas important to nesting sage grouse would be grazed at lower levels. These variable use levels will be established during site-specific Allotment Management Planning. Regardless, livestock will be moved or removed when allowable use has been met in key areas. If the key areas are located where the vegetation is primarily highly palatable species, then overall use would not exceed 50 percent. Most of the CNG is dominated by crested wheatgrass which can withstand, and benefits from, higher levels of grazing. Furthermore, native understory plants and crested wheatgrass are seldom found together on the Curlew (see Field Review Notes 9/17-9/18/01). Some of the species you mention above are more palatable than crested wheatgrass but they are also nonnative.

Most of the plants you mention are more sensitive and less able to survive the annual precipitation variations. These plants are not frequent or abundant in the seedings that exist today on the Grassland. To reduce the level of use on crested wheatgrass would only make crested wheatgrass MORE competitive and robust, keeping out any plants trying to invade the site.

To improve these sites for wildlife, we are looking at ways to introduce species that can effectively compete with crested wheatgrass. In order to achieve this objective, seeding mixes will need to include an appropriate percentage of seeds and planted in such a way that they will not attract cattle or wildlife to a small area which could become overgrazed immediately.

Letter Number *27 - Curlew DEIS* Comment ID 467

Comment: DEIS p. 3-84: "Actual use has remained at about 18,000 head months annually." This understates recent actual use, which was steadily increased, averaging 19,256 HM during the 1998-2000 period. (See table in letter)

Response: This is usually due to environmental conditions. As described perviously, livestock are removed when the use levels have been met. Thus, when production is high, actual use could be 21,000+ Head months, and when production is lower, use may be 18,000 Head months. Utilization levels would have been the same, however.

Your comment referring to 19,256 Head months is actually authorized use, that is, the actual number of head months the livestock permittees paid for. It should be noted that because of drought conditions on the Grassland over the past two or three years, permittees have voluntaril come off the Grassland as early as mid to late September. This voluntary reduction is not reflected in the authorized use number you cite in your comment.

Category **Revised Plan**

Letter Number *27 - Curlew DEIS* Comment ID 452

Comment: - DLRMP 3-2 sets the ecological objective ""Within 10 years... reassess [PFC)." DLRAP p. 5-6 advises: 'It is unlikely that annual budgets will fully fund the monitoring effort ... " Monitoring has never been a Grassland priority.

Response: The objective in the Grassland Plan is to reassess vegetation properly functioning conditions of ecosystems on the Grassland and adjacent areas, where appropriate. This objective is an assessment, not monitoring. The reassessment of vegetation properly functioning condition should help us better understand how our management actions are affecting the resources and habitat needs on the Grassland. Objectives in the Grassland Plan are designed to be accomplished during the planning period. The annual monitoring report will provide an update to the public on our progress.

Letter Number *27 - Curlew DEIS* Comment ID 479

Comment: DLRMP p. 2-3: Recommended wording "The analysis of Grassland resources contained a cursory estimation of rangeland capability and suitability using methods not prescribed in the Interagency Range Handbook or "based upon theoretical approaches or research methods generally accepted in the scientific community" (40 CFR 1502.22(4). "

Response: Appendix F in the EIS describes the criteria and protocol used to determine livestock capability and suitability. The Forest Service does not use an Interagency Range Handbook to determine rangeland capability or suitability. Capability is an assessment of the biophysical characteristics of an area that make it conducive to livestock grazing. The criteria evaluated are discussed on in the Livestock Grazing section of Chapter 3 and in Appendix F. All the land within the CNG was determined to be capable of being grazed. Suitability considers the appropriateness of livestock grazing on a particular area based on the economic and environmental consequences and considerations for other uses that may be affected by livestock grazing (FSH 2209.21).

Appendix G describes the methods used to calculate Grassland forage production in order to estimate a range of potential head months in each of the alternatives. The sole purpose was to show the potential differences between the alternatives, not to set specific livestock numbers. This is clearly stated in the EIS.

Because District transect data was dated, the ID Team felt the need to assess forage production using several other methods to validate a reasonable range of forage production and resulting potential head months. A high, medium, and low forage production figure resulted from these computations. Again, this was done to show differences between alternatives and not to set specific permitted livestock numbers. A site-specific analysis will be necessary to arrive at carrying capacities and permitted livestock numbers.

Letter Number *27 - Curlew DEIS* Comment ID 480

Comment: DLRMP p. 2-9: Recommended wording: "DEQ biomonitoring indicates 4 Grassland streams - Rock Creek, Deep Creek, Meadow Brook, and Sheep Creek -- are degraded (DEQ comments 3/15/99 at p.6 of 'Content Analysis of AMS Comments Received', April, 1999)."

Response: A paragraph summarizing DEQ's water quality assessments has been added to the Riparian/Wetland Areas section in Chapter 3 of the EIS.

Letter Number *27 - Curlew DEIS* Comment ID 481

Comment: DLRI*AP p. 2-25: Inventory and Research needs:

- Add: "Are Spotted frogs, or other Sensitive species, present on the Grassland, and how has past and current management affected their distribution?"

- Re: "What is the correlation between livestock utilization levels and residual vegetation." We have concerns this "need" facilitates delaying needed change. Timothy's May, 2000 transect data (Table 3.11 DEIS p. 3-43) documents CNG cattle grazing preventing 7 inch sage grouse residual nesting cover. Similarly, USFS Utilization Gauge discussed in R-4 FSH 2209.21 R4 Range Analysis Handbook, 1986, 4.22f accurately predicts stubble height at various utilization levels. No more data is needed - just conscientious action.

- Recommend adding to Issue I - Riparian and Watershed Mgmt: "Inadequate ground cover for soil protection."

- Issue 2 - The DEIS and DLRMP subjectively premise Grasslands management goals to be attainment of "PFC" of sagebrush systems. Fixation on sagebrush contribution to PFC ignores equally or more important ecological factors. Full, scientific discussion would include understory composition to PFC determination. Flawed DEIS PFC assumptions are evident in:

- Failure to document even one actual Grassland occurrence of the repeatedly raised specter of "system degradation beyond the point of resiliency and sustainability" (Initial Analysis of the Management Situation, Caribou NF April 1999, p. 4-35) or "loss of "physical/biological components of ecosystems" (Draft CNF... Sub-Regional Assessment Properly Functioning Condition, 1997 Append. A, p. I p.).

- Estimating PFC by poor measures of sagebrush canopy, one of a great many ecological parameters.

- Vilifying dense sagebrush, essential to sage grouse, the Grassland's primary MIS, while ignoring the ecologic risk present in the many fields dominated by a small number of seeded exotic herbaceous species. The DEIS fails to address this fact despite the Forest's recognition that "Exotic plant seedings have simplified species composition, reduced biodiversity, increased soil erosion, changed species interactions and forage availability and reduced the systems ability to buffer against change or act as wildlife strongholds ... " ("Initial Analysis of the Management Situation Caribou National Forest - April, 1999", p. 4-60).

- Incomplete and unscientific analysis of factors influencing PFC but not adequately considering grazing effects. The DEIS vilifies sagebrush's natural tendency to increase canopy coverage, barely mentioning deleterious effects of grazing on PFC, and ignoring "The grass and forb understory on sagebrush] sites is diminishing because of grazing in combination with the increase in overstory sagebrush (> 1 5 percent)." (Draft Regional Assessment Properly Functioning Condition, Dec. 23, 1996).

Response: Sensitive species are discussed in Chapter 3 of the EIS. As stated, only one sensitive wildlife species is known to occur on the Grassland, and one could potentially be present (foraging habitat for western big-eared bat). Effects on these species are discussed in Chapter 4 and in the BE for the selected alternative, Alternative H, in Appendix J.

In addition, Chapter 3 contains additional information on residual vegetation in the Wildlife Habitat Management section.

It should be noted that the Curlew National Grassland is a highly altered landscape with more than 66% of the acres plowed and seeded to forage producing species, primarily crested wheatgrass. Only about 12,000 acres remain in a native state. The majority of the Curlew NG is not indicative of a native shrub-steppe ecosystem found on other parts of the Caribou National Forest. During allotment management planning at the site-specific level, monitoring on key areas over a two or three year period will be the key to establishing carrying capacity and stocking levels as well as adjustments to grazing patterns and season of use.

Understory is an important ecological factor when considering wildlife habitat needs and ecological conditions. The PFC assessment was used to estimate the degree of departure from, or similarity to the subregional and landscape scale indicators of PFC as documented in the PFC rapid assessment process developed by the Intermountain Region (USDA, Intermountain Region, 1997). Because the landscape has been so highly altered by agricultural use prior to the Bankhead-Jones Act and because much of the area that had been in agricultural production was seeded to introduced species such as bulbous bluegrass and crested wheatgrass, it was difficu to assess understory as part of PFC. However, a team of specialists agreed that sagebrush

systems on the Grassland are considered to be at risk (of system degradation beyond the point of resiliency and sustainablity) because the sagebrush structure is skewed toward older age classes which contribute to reduced understory composition and production and changes in the fire return intervals. There was no intent to document actual occurrences on the Grassland in the assessment but to assess the risk. Sagebrush structure is the criteria for assessing PFC in the Intermountain Region PFC rapid assessment guide. The effects of exotic species such as bulbous bluegrass and sagebrush canopy cover on wildlife species is documented under Wildlife Habitat Management in each alternative in Chapter 4 of the EIS. Livestock grazing was considered in the PFC and documented in the assessment (see page 33 of AMS).

Letter Number *27 - Curlew DEIS* Comment ID 453

Comment: These documents appear to again leave improved management to the next generation of agency cadre. Retirement of key West Side District specialists, budget shortfalls, busy fire seasons, etc. always provide reasons for delaying tough decisions. Many Grassland actions have been promised to participants and the public, but not delivered:

- Curlew AMP 1982 (p.6): "A system of grazing will be used in which approximately 60 percent o desirable forage species are grazed on established bench marks". - Bench marks were not established. Forage utilization has not been monitored

- Buist AMP 1982: (p.5): "A system of grazing will be used in which approximately 60% of desirable forage species are grazed on established bench marks". - Bench marks were not established. Forage utilization has not been monitored

- 1985 Forest Plan:

- "Establish a monitoring system on each allotment to determine range trend and grazing capacity." (p. 1111-34) - not done

- Monitor forage utilization on 50 percent of allotments annually (p. V-6)- not done

- Monitor range condition & trend on I 0 percent of allotments annually (p. V-6)- not done

- Monitor carrying capacity (AUMS) on 20 percent of allotments annually (p. V-6)- not done

- 1986-1991 Forest Plan Monitoring Highlights (p. 16): Develop methods to quantitatively describe condition and trend - not done

Response: We are uncertain about how the commentor has concluded that this monitoring has not been done at all. Average use on the Curlew has been about 60 percent for the past decade (Timothy pers. comm., 2001) (Field Notes, 9/17/01).

It is doubtful that needed action to meet resource needs on the Grassland will be deferred to the "next generation" of Forest Service managers. While the daily pressure of agency business, wit limited budgets and stretched personnel, can create conflciting priorities, the Plan establishes specific direction to lead to improved conditions on the Grassland and allow sustainable grazing and habitat for grouse.

Alternative H, the selected alternative in the Record of Decision, proposes adaptive strategies and focused monitoring. For example, annual livestock monitoring includes utilization monitoring on key areas and annual utilization mapping. The Forest is required to provide to the public an annual monitoring report. This report will address all of the monitoring requirements in Chapter 5 of the Grassland Plan. The annual report discusses monitoring accomplishments and findings.

The Final Plan includes direction to update AMPs within 3 years after the ROD is signed. Standards and Guidelines in the Grassland Plan will be implemented immediately through the Annual Livestock Operating Plans and should be in effect the grazing season following the signing of the Record of Decision (2002 grazing season).

Letter Number *27 - Curlew DEIS* Comment ID 485

Comment: DLRMP p. 2-27: Recommended additions to last paragraph Forest authorities in Grassland Grazing Agreements and Rules of Management:

- "Grassland Grazing Agreements may be terminated at any time by either party six (6) months after written notice is given requesting such termination. "

- "Grassland Rules of Management allow for grazing reductions when the Forest Officer in charge determines a need for a reduction. Grazing permits will be reduced until the necessary reduction is accomplished."

Response: Cancellation or any other action against the Grazing Agreements would be done according to the Uniform Action Guidelines of the Intermountain Region as described in FSH 2209.13.

Actual livestock use varies from year to year based on environmental conditions. The Forest Officer can instruct permittees to move their livestock when actual use is met even if it is well before the scheduled date. For instance, in 2001 the Buist Association moved 2 weeks early; this amounts to a practical reduction of 20% for this year. This is standard range allotment administration specified in Part 2 of the Grazing Permit and does not require repetition. Furthermore, this is already included in Part VI of the Rules of Management of Buist Association.

Letter Number *27 - Curlew DEIS* Comment ID 489

Comment: DLRMP p. 3-12: Range objectives:

- " 1. Within three years of signing the ROD, Allotment Management Plans will be updated for the Curlew Valley Association and the Buist Association fields. " IWF recommends immediate implementation of 30-40% upland forage utilization standard.

- Add "6. Close areas to grazing which do not have adequate ground cover."

Response: Alternative C proposes a 30-40% upland forage livestock utilization level. The effects are described in Chapter 4 of the EIS.

Alternative H, the selected alternative in the Record of Decision, proposes a 50 percent utilization level Grassland-wide. The Plan is also adaptive to the needs of sage grouse by emphasizing lighter livestock use in areas of the Grassland that are important to sage grouse for nesting and brood-rearing while allowing heavier use in areas where crested wheatgrass is predominant in the understory to maintain the plant's vigor. Grazing patterns would rotate over time. As a result of this adaptive strategy, a portion, if not all, of the Grassland will provide adequate nesting cove for sage grouse.

In addition the Grassland monitoring plan includes annual utilization monitoring on key areas and annual utilization mapping. It is reasonable to expect that some areas of the Grassland, particularly around water developments, may experience a lack of adequate ground cover during the grazing season. To close these areas to grazing would not be reasonable. Generally, once livestock are removed these areas regain a portion of ground cover during the year.

Letter Number *27 - Curlew DEIS* Comment ID 449

Comment: - The Plan should not treat sagebrush until, as Holechek and others support Braun, "Control should not be applied where sagebrush cover is less than 20% ... "

Response: The final EIS includes a new alternative, Alternative H, which is a blend of features from Alternative F and G. This alternative would manage to maintain the existing sagebrush canopy cover over the ten-year plan period using a combination of light and heavy herbicide applications or mechanical treatments. Vegetation treatments would be prioritized in areas of the Grassland where sagebrush canopy cover exceeds 25 percent. We believe this addresses your concern.

Alternative H is the selected alternative in the Record of Decision.

Letter Number *27 - Curlew DEIS* Comment ID 492

Comment: DLRMP p. 4- 1 0: Range Upland Utilization Standards -

Unless backed by a preponderance of scientific evidence, recommend to attain management objectives.

"1 - (S) Upland Utilization Standards: 30-40% utilization for both native and non-native forage species...." (Holechek 1991:14)

Response: Almost 75 percent of the capable and suitable land within the Grassland boundary is crested wheatgrass. Crested wheatgrass, an introduced species, is one of those that Holechek would describe as highly adapted to grazing. Almost all of the key sites (where utilization monitoring occurs) lie within the crested wheatgrass community. Based on an eleven year study in Utah (Grazing Intensities and Systems on Crested Wheatgrass in Central Utah: Response of Vegetation and Cattle, Tech Bull #1388) researchers evaluated the vegetation response and the cattle response under different grazing intensities and rotations. Their recommendation was that "crested wheatgrass used for spring grazing in the intermountain region should be managed under a rotation system utilizing about 65% percent of the herbage produced." This was considered to be a moderate level of use for crested wheatgrass. The light level was 53%. Other studies (Horton and Weissert) support grazing crested wheatgrass heavier than native species.

With low use levels on crested wheatgrass sites, grazing is very uneven; some plants are totally grazed while other plants are left untouched. The untouched "wolf" plants become coarse and unpalatable. After many years, the ungrazed plants lose vigor and the undersoty becomes very patchy. (See FEIS, Chapter 3, Disturbances, Crested Wheatgrass). The remaining 25 percent of the Grassland is a native bunchgrass type. These area are in the more rugged terrain that was not plowed. Due to the topography and distance from water, it is unlikely that utilization would reach 40% on this sites before the 50% use level is met on crested wheatgrass. Thus, livestock would probably be moved at much lower use levels.

Letter Number *27 - Curlew DEIS* Comment ID 448

Comment: - The EIS should reincorporate the previously discarded proposed 7 inch high April-May sage grouse nesting cover. That degree of utilization is good range management, approximating Holechek's (I 998:218) recommended grazing of Idaho fescue and Bluebunch wheatgrass to 6" stubble heights.

Response: We are unaware of any studies that Holechek has done in the Intermountain West and therefore have not utilized his studies. There is no Idaho fescue on the Curlew and Holechek's work has been done in different precipitation zones. We are unclear why the commentor thinks we have discarded the 7 inch stubble height guideline from the Idaho Sage Grouse Guidelines.

Letter Number *27 - Curlew DEIS* Comment ID 484

Comment: - Issue 2 - The DEIS and DLFIVT subjectively premise Grasslands management goals to be attainment of "PFC" of sagebrush systems. Fixation on sagebrush contribution to PFC ignores equally or more important ecological factors. Full, scientific discussion would include understory composition to PFC determination. Flawed DEIS PFC assumptions are evident in:

- Failure to document even one actual Grassland occurrence of the repeatedly raised specter of "system degradation beyond the point of resiliency and sustainability" (Initial Analysis of the Management Situation, Caribou NF April 1999, p. 4-35) or "loss of "physical/biological components of ecosystems" (Draft CNF... Sub-Regional Assessment Properly Functioning Condition, 1997 Append. A, p. I p.).

- Estimating PFC by poor measures of sagebrush canopy, one of a great many ecological parameters.

- Vilifying dense sagebrush, essential to sage grouse, the Grassland's primary MIS, while ignoring the ecologic risk present in the many fields dominated by a small number of seeded exotic herbaceous species. The DEIS fails to address this fact despite the Forest's recognition that "Exotic plant seedings have simplified species composition, reduced biodiversity, increased soil erosion, changed species interactions and forage availability and reduced the systems ability to buffer against change or act as wildlife strongholds ... " ("Initial Analysis of the Management Situation Caribou National Forest - April, 1999", p. 4-60).

- Incomplete and unscientific analysis of factors influencing PFC but not adequately considering grazing effects. The DEIS vilifies sagebrush's natural tendency to increase canopy coverage, barely mentioning deleterious effects of grazing on PFC, and ignoring "The grass and forb understory on sagebrush] sites is diminishing because of grazing in combination with the increase in overstory sagebrush (> 1 5 percent)." (Draft Regional Assessment Properly Functioning Condition, Dec. 23, 1996).

Response: The Vegetation Management section in Chapter 3 of the EIS describes the context of the PFC assessment for the Grassland. Because 95% of the Grassland is successional to sagebrush, the PFC assessment focused on sagebrush composition, structure, disturbance, and patterns/distribution. (LW)

Understory is an important ecological factor when considering wildlife habitat needs and ecological conditions. Understory is addressed in the Vegetation Understory section of Chapter 3 and the effects on understory are discussed under each of the alternatives in Chapter 4.

The PFC assessment was used to estimate the degree of departure from, or similarity to the subregional and landscape scale indicators of PFC as documented in the PFC rapid assessment process developed by the Intermountain Region (USDA, Intermountain Region, 1997). Because the landscape has been so highly altered by agricultural use prior to the Bankhead-Jones Act and because much of the area that had been in agricultural production was seeded to introduced species such as bulbous bluegrass and crested wheatgrass, it was difficult to assess understo as part of PFC. However, a team of specialists agreed that sagebrush systems on the Grassland are considered to be at risk (of system degradation beyond the point of resiliency and sustainablity) because the sagebrush structure is skewed toward older age classes which contribute to reduced understory composition and production and changes in the fire return intervals. There was no intent to document actual occurrences on the Grassland in the assessment but to assess the risk. Sagebrush structure is the criteria for assessing PFC in the Intermountain Region PFC rapid assessment guide. The effects of exotic species such as bulbous bluegrass and sagebrush canopy cover on wildlife species is documented under Wildlife Habitat Management in each alternative in Chapter 4 of the EIS. Livestock grazing was considered in the PFC and documented in the assessment (see page 33 of AMS).

Category **Riparian Areas**

Letter Number *27 - Curlew DEIS* Comment ID 475

Comment: DEIS p. 4-135: Riparian areas would be "utilized at 30 percent or to 6-inch stubble height at the end of the grazing season." This vague prescription could be met by complete (100%) hot season utilization, then 6 inch regrowth after cattle removal in late August. Such 'attainment" would defeat management intent to allow palatable sedges to flourish and maintain standing herbage to comb sediment from summer high flows. A more appropriate prescription is "utilized at 30 percent or to 6-inch stubble height at the end of the grazing period' as committed to at DLRMP p. 4-5.

Response: There are three basic times in which utilization may be measured. These are: at the end of the grazing period (the time when livestock are in a specific pasture or unit); the end of the grazing season (the total time allocated to grazing within the allotment or field, usually set in the Allotment Management Plan and/or Annual Operating Plan); and at the end of the growing season (the time of year when a specific plant stops growing, which may vary from year to yea

The standard in the Grassland Plan, as it is written, is measured at the end of the grazing season, which does allow for regrowth. It is possible that livestock could clip streamside vegetation to one or two inches during the grazing period, and regrowth could restore a six-inch stubble height by the end of the grazing season. However, if utilization levels were too heavy during the grazing period, streambank disturbance standards would likely be met before stubble height was reduced to an unacceptable height to provide other riparian functions, such as sediment filtration.

Letter Number *27 - Curlew DEIS* Comment ID 483

Comment: - Recommend adding to Issue I - Riparian and Watershed Mgmt: "Inadequate ground cover for soil protection."

Response: The need for adequate ground cover for soil protection is contained in, and part of, watershed condition and stability. In Chapter 4 under Watershed Condition, it states that soil productivity should be maintained if soil erosion rates do not exceed 5 tons per acre. Table 4.2 depicts estimated soil loss given percent slope, ground cover and precipitation intensities. Under most conditions, 60 percent ground cover is adequate to protect soils from excessive erosion. For example, if 60 percent ground cover is maintained, soil erosion rates would not be exceeded even on 30 percent slopes that receive a thirty year precipitation event; whereas erosion rates would be exceeded for the same slope and precipitation event if ground cover was reduced to 4 percent.

Letter Number *27 - Curlew DEIS* Comment ID 482

Comment: - Recommend adding to Issue I - Riparian and Watershed Mgmt: "Inadequate ground cover for soil protection."

Response: The need for adequate ground cover for soil protection is contained in, and part of, watershed condition and stability. The Watershed Condition section under Alternative A discussion in Chapter 4 states that soil productivity should be maintained if soil erosion rates do not exceed 5 tons per acre. Table 4.2 depicts estimated soil loss given percent slope, ground cover and precipitation intensities. Under most conditions, 60 percent ground cover is adequate to protect soils from excessive erosion. For example, if 60 percent ground cover is maintained, soil erosion rates would not be exceeded even on 30 percent slopes that receive a thirty year precipitation event; whereas erosion rates would be exceeded for the same slope and precipitation event if ground cover was reduced to 40 percent.

Also refer to page 3-3, Soils Guideline #4 in the Draft LRMp for the Curlew NG. (LW)

Letter Number *27 - Curlew DEIS* Comment ID 476

Comment: DEIS p. 4-136-137: Please identify which of "Many [CNG stream channels] have been degraded to the point that it would be impractical to restore them to a more natural condition."

Response: Chapter 3 of the FEIS, Baseline Indicator Section, Watershed Condition and Riparian/wetland subheadings include a complete discussion of existing stream and watershed conditions.

Category **Soils**

Letter Number *27 - Curlew DEIS* Comment ID 454

Comment: DEIS p. 3-8: "Recently, the NRCS updated soil mapping on the Grassland in the Oneida County Soil Survey. This site-specific information provides potential soil productivity useful in planning and implementation."

The DEIS makes no use of NRCS "site-specific...soil productivity" information, basing forage estimates instead on 3 subjective, WAG estimates.

Response: Soil survey data from the Oneida County Soil Survey was used to develop the LRMP for the Grassland (See Chapter3, FEIS). This information was used to map areas that would not be appropriate for some types of vegetation treatments. "No-till" acres are identified and mapped in each of the alternatives (See FEIS, Chapter 2)

This information was also used for evaluating capable range. Soil productivity data in the Oneida County Soil Survey are estimates based on range site information. This data often over-estimates productivity on the Grassland and is not based on canopy cover which limits understory production. Range productivity was calculated using the best available information based on the percent canopy cover present, treatment and utilization levels proposed in each alternative. The FEIS clearly states this information is not to be extrapolated to determine livestock stocking levels, carrying capacity or permitted use.

Letter Number *27 - Curlew DEIS* Comment ID 470

Comment: DEISp.4-5: "Hoof action could continue to detrimentally impact microbiotic crusts overtime." Studies of trampling disturbance indicate losses of moss cover, lichen cover, and cyanobacterial presence can be severe (1/10, 1/3, and 1/2 respectively), runoff can increase by half, and the rate of soil loss can increase six times without apparent damage to vegetation. Disturbance to soil surfaces in arid regions can lead to large soil losses (http://www.soilcrust.org/crustlOl.htm). not scientifically supported, change DEIS statement to: "Cattle hoof action will continue to detrimentally impact microbiotic crusts, further reducing ground cover. " Establish soil crust monitoring in accordance with guidelines at http://www.soilcrust.org/advanced.htm.

Response: The FEIS, Chapter 3, contains a discussion of microbiotic crusts. The Grassland Plan also includes direction for microbiotic crusts in Chapter 3 under Soils.

Letter Number *27 - Curlew DEIS* Comment ID 471

Comment: DEIS p. 4-6: "If microbiotic crusts are trampled, they may no longer provide a viable ground cover source." Studies of trampling disturbance have noted that losses of moss cover, lichen cover, and cyanobacterial presence can be severe (1/10, 1/3, and ½ respectively), runoff can increase by half, and the rate of soil loss can increase six times without apparent damage to vegetation. Disturbance to soil surfaces in arid regions can lead to large soil losses (http://www.soilcrust.org/crustl0l.htm).

Continued grazing in all alternatives except D will trample crusts. Recommended wording: "Trampling by cattle will crush microbiotic crusts, preventing crusts from providing viable ground cover. Cryptogamic ground cover would be irretrievably lost. " Establish soil crust monitoring in accordance with guidelines at http://www.soilcrust.org/advanced.htm.

Response: The final EIS includes a discussion of microbiotic crusts. See Chapter 3, Soils section. The Grassland Plan also includes direction of microbiotic crusts. See Chapter 3 in the Plan under Soils.

Category **Vegetation**

Letter Number *27 - Curlew DEIS* Comment ID 486

Comment: DLRMP p, 3-8: Vegetation Standards & Guides 7.(G): "Introduced species may be used in project seedings... (4) when the use of native seed sources is not cost-effective." Inclusion of native species in seed mixes when "cost effective" precludes almost any situation as FSM 1905(16) defines Cost Effective as "Achieving specified outputs or objectives under given conditions for the least cost. " Native seed is never a least cost alternative.

Response: You are correct if you are thinking in terms of the dollar cost of the seed mixes. Nonnative seed is generally much less expensive to purchase than native seed. This does not consider the resource cost and benefit. Native species are more desirable from a wildlife and vegetation diversity standpoint. For these reasons, they can be the most costly to buy but have a higher benefit to cost ratio. Introduced species such as crested wheatgrass were planted, in part, for their high forage production and to a great extent because crested wheatgrass can estaoblish and grow in harsh climatic conditions.

Letter Number *27 - Curlew DEIS* Comment ID 455

Comment: DEIS p. 3-13-. "Because of low precipitation - less than 12 inches per year..." conflicts with DEIS p. 3-6's "5 to 20 inches" of precipitation and Table 3.5 (p. 3-22) estimate of 8 to 19 inches.

Response: The twelve inches of precipitation discussed in Chapter 3 is an annual average across the basin. The 5-20 inches of precipitation reflects the range. The 8-19 inches depicted reflects the growin range of various sage brush types.

Letter Number *27 - Curlew DEIS* Comment ID 457

Comment: DEIS p. 3-22: Table 3.5 fists significant amounts of prevalent forbs, yet DEIS omits any analysis or conclusions of effects of proposed "light herbicide" treatments on forbs.

Response: The effects of light herbicide treatment on forbs will vary with the application rates and types of herbicides. In general, the herbicides used would be those that target deep rooted shrubs such as Tebuthiron (Spike 20P). With these chemicals, a very high application rate would be required before affecting forbs. At rates that would reduce sagebrush canopy cover to approximately 15%, the effects of herbicides such as tebuthiron would be negligible (Probert, pers. comm. 2001; Baxter 1999).

Furthermore, this would be analyzed in detail in the site specific analysis documents for each treatment.

Letter Number *27 - Curlew DEIS* Comment ID 472

Comment: DEIS p. 4-16: To ensure accuracy, the statement "forage production on crested wheatgrass sites could increase... almost 3 to 20 times higher than native plant communities" should be validated for the CNG.

Response: Once a decision is made on an alternative, the appropriate utilization rate will be implemented through the grazing agreements. Production becomes almost a moot point because it can vary so much annually based on the yearly weather patterns. Livestock will be managed and moved based on their use of each pasture under the chosen utilization rate.

Category **Water Quality**

Letter Number *27 - Curlew DEIS* Comment ID 456

Comment: DEIS p. 3-15: "All landowners, including the Forest Service, are required to comply with these [TMDL] standards..... which are?

Response: South Fork Rock Creek (Water Quality Limited Segment No. 5273) has the listed segment boundary as "Headwaters to Rock Creek". The segment was listed in 1998. The identified pollutant is sediment. South Fork Rock Creek is included in the Lake Walcot Subbasin Assessment and TMDL, approved by EPA in October 2000. The State of Idaho listed causes of impairment as: 1) dryland agriculture; 2) irrigated agriculture; 3) range lands; and 4) forest practices. Irrigated and dryland agriculture contributes about 75%-80% of the sediment loading within the entire South Fork Rock Creek watershed. The Forest Service is expected to meet water quality standards for watersheds it manages to the same extent as any other land owner, individual or corporation. The State has already established TMDLs for the Rock Creek basin. The TMDL is: "…for sediment in the tributaries is 50mg/L on a monthly average with an 80mg/L TSS daily maximum." As such, a formal WQRP for South Fork Rock Creek does not need to be, and will not be, completed. The primary activity on the Grassland that has an effect on water quality is livestock grazing. Livestock have been restricted from the streamside area of South Fork Rock Creek by installing a riparian pasture, reducing water quality degradation from this source. A Grasslands-wide objective stated on page 3-6 in the Draft Land and Resource Management Plan (LRMP) is: "Within two years of the signing of the ROD, develop a riparian strategy and action plan to restore all non-functioning and at-risk stream systems on the Grassland." This strategy will also address water quality.

Letter Number *27 - Curlew DEIS* Comment ID 478

Comment: DEIS p. 4-159: "In some areas bacterial levels are elevated from livestock wastes." Do bacterial levels exceed water quality standards? If unknown, minimal field data would provide the decisior maker with that essential information.

Response: The State of Idaho, through their water quality assessment Beneficial Use Reconnaissance Project (BURP), has assessed water quality within the Grassland area. Sheep Creek was found to have elevated bacteria levels. However, a single water sample exceeding an E.coli standard does not in itself constitute a violation of water quality standards (IDAPA 58.01.02.080.03).

There are no beneficial uses specifically identified for Sheep Creek. In the absence of specific designated beneficial uses, state protocol specifies that recreation and the propagation of fish, shellfish and wildlife, wherever attainable (IDAPA 58.01.02.101.01). There are no bacteria standards for aquatic life. For recreation, E.coli organisms per 100 ml are not to exceed a single sample of 406 or a geometric mean of 126, based on a minimum of 5 samples taken every 3-5 days for 30 days (IDAPA 58.01.02.251.01). Additional monitoring will be conducted in the future to more fully evaluate the extent of the problem and hopefully isolate the source. It should be noted that Sheep Creek within the Grassland boundary was dry during most of 2001.

Category **Watershed**

Letter Number *27 - Curlew DEIS* Comment ID 464

Comment: DEIS p. 3-65: Table 3.18 indicates all CNG areas have Low Overall Watershed Ratings.

Response: All watershed ratings, using the Inland West Watershed Initiative protocol, are moderate to low. These ratings largely reflect past and present agricultural activities, including farming and livestock grazing, both within and adjacent to the Grassland.

Category **Wildlife**

Letter Number *27 - Curlew DEIS* Comment ID 473

Comment: DEIS p. 4-29: Surveys should be conducted for Pygmy rabbit and all other Sensitive species.

Response: The Forest Service Manual contains direction (2670) for the management of Sensitive Species. Currently, the pygmy rabbit has not been identified as a Sensitive Species, but has been identified as a potential species-at-risk.

A published distribution map (Groves, et al, 1997) shows potential habitat across much of Oneida County. This distribution map was developed thru the use of GIS, using county-of-occurrence data from Idaho Conservation Data Center (CDC) and vegetation maps for Idaho.

A recent review by CDC (March 7, 2001) shows records on the western edge of Oneida County (west of the Grasslands) and in the vicinity of Downey (In Bannock County to the east of the Grasslands). There are no known records of pygmy rabbits in the Grasslands, but based on these other records, it is assumed that pygmy rabbits were present at least historically. Much of the Curlew has been heavily modified historically (plowing, farming etc) and it is not known what effect this could have had, but fragmentation of habitat historically could be critical to current distribution.

A GIS query was run for the Curlew Grasslands in 12/2000. The predictive model included habitat criteria identified by Gabler, et al, (2000) and Katzner and Parker (1997), and included (1) sagebrush canopy cover 15-25% or canopy cover greater than 25%; and (2) 0-15% slope and (
aspect of 300-360 or 0-120 degrees. Soils are generally a key criteria; however after discussion with John Lott (Soils Scientist) all soils on the Curlew have the potential to provide habitat.

This query identified 7 high priority survey areas, and three lower priority areas. These 10 sites are all on the northern end of the Curlew (2 on private), while none were identified on the southern-most unit.

To date, only one survey has been done. On 12/21/2000 snow-tracking surveys were done in th
Meadow Brook Creek area. Several trails were found; one believed to be jackrabbit, a couple of cottontails, and one that could be pygmy rabbit. However, this was inconclusive because there is
quite a bit of overlap with cottontails. Additional surveys are needed to determine the current status of pygmy rabbits on the Curlew.

As discussed in the EIS, there are only two sensitive species that have suitable habitat or ranges
that extend onto the Grassland (Columbian sharp-tailed grouse and western big-earred bat). Both of these species are analyzed in the document andhave been addressed again in the Biological Evaluation prepared for the selected alternative (See Appendix J). This BE will also include documentation/rationale for why the other sensitive species have not been included in the analysis.

The Grassland Plan includes direction for the management of TES species and/or habitat (See Chapter 3, Wildlife Habitat Management).

Letter Number *27 - Curlew DEIS* Comment ID 487

Comment: DLRMP p, 3-9: Grassland management should do its part to restore west-wide sage grouse populations and fulfill the Regional Forester's commitment to increased Sage grouse numbers in the 2000 Federal-WAFGA MOU. Recommended wording of Sage grouse and sharp-tail goal:

1. Habitat conditions will sustain increased populations of Sage and Columbian sharp-tailed grouse. Target population of sage grouse is reestablishing the 1979 population of 400 male sage grouse displaying on Grassland leks and 1,000 wintering on the Grassland (Curlew Wildlife Plan p.24).

Response: The USFS has signed a MOU (2001) with the Western Association of Fish and Wildlife Agencies, BLM and USFWS to direct conservation efforts for sage grouse and sagebrush. This MOU guides sage grouse conservation planning, formulates state working groups and establishes a framework team to provide assistance and insure consistency.

Wording of the sage grouse and sharp-tailed grouse goals have been reviewed for the Final Plan to insure they are consistent with the MOU.

Letter Number *27 - Curlew DEIS* Comment ID 488

Comment: DLRMP p. 3-9: Recommend wording of Sage grouse and sharp-tail Standard and Guideline:

- "1.(G) Current guidelines for sage and sharp-tailed grouse management will be used in site-specific recommendations for proposed sagebrush treatments."

- 7.(G): Provide 7 inch high residual nesting cover during April-May nesting period.

Response: The Grassland Plan includes standards and guidelines that reflect your comments. In regards to your first suggestion, please refer to Management Prescription 6.5 in Chapter 4 of the Grassland Plan. See Guideline #1 on page 4-17.

In response to your second suggestion, it has been incorporated into management prescription 6.5 as well. Please refer to Wildlife Habitat Management, Guideline #2.

Letter Number *27 - Curlew DEIS* Comment ID 461

Comment: DEIS p. 3-43: "Draft Idaho Columbian Sharp-tailed Grouse Conservation Plan (LJlliman, et al, 1998, pg. 16) advocates the retention of at least 8 inches of residual cover... The Idaho Sage Grouse Management Plan (Idaho, 1997, pg. 12) recommends that nesting and early brood rearing habitat be managed to provide 15-25 percent sagebrush canopy coverage and about 7 inches or more of grass and forb understory during the May nesting period. " In fact, the latter publication advocates 7 inches not during "May", but during the spring nesting season - April through May. May grass heights reflect growth at the end of nesting. Table 3.11 (DEIS p. 3-43) thus documents inadequate nesting cover.

Response: Guidelines used for this analysis are out of Connelly, et al, (2000). This document includes a height recommendation for the spring nesting season. Current utilization levels (~60% grassland-wide) have not met this guideline.

Alternative H, the selected alternative in the Record of Decision, proposes adaptive strategies for livestock grazing that should result in a portion, if not all, of the Grassland meeting residual vegetation guidelines. For example, areas of the Grassland important for sage grouse nesting and brood-rearing would be grazed lighter than other areas. Areas that contain predominantly crested wheatgrass in the understory may be grazed heavier to maintain the vigor of the plant. Grazing patterns would rotate from year to year. In addition, Alternative H proposes to maintain the existing sagebrush canopy cover classes using heavy and light herbicide applications or mechanical methods. Vegetation treatments would be prioritized in areas of the Grassland that are in greater than 25 percent canopy cover. Focused monitoring in this alternative, including annual utilization monitoring on key areas, annual utilization mapping, and habitat mapping in cooperation with Idaho Fish and Game, should help us understand the relationships between resource conditions, wildlife needs, and human uses.

Letter Number *27 - Curlew DEIS* Comment ID 460

Comment: DEIS p. 3 -4 1: DEIS quantifies sage grouse populations on the CNG as " 144 male sage grouse" and "between 537 and 581... survive into the fall prior to hunting season." Inform readers that this is a 64% reduction since 1979, when 400 males displayed on CNG leks and 1,000 vantered on the CNG (Wildlife Plan p.24).

Response: The final EIS contains additional information on sage grouse population trends. Appendix I contains a comprehensive review of all data available at the time of this analysis. Some of this information has also been included in Chapter 3, Wildlife Habitat Management section.

Letter Number *27 - Curlew DEIS* Comment ID 459

Comment: DEIS p. 3-38: Despite several other species dependence on sagebrush ecosystems, CNG designates sage grouse as its only Management Indicator Species MS).

Response: The sage grouse has been identified as the MIS for sagebrush habitats. As discussed in the EIS in Chapter 3, Wildlife Habitat Management, there are several species of sagebrush obligates considered, but they have not been identified as species-at-risk in the Idaho Bird Conservation Plan (IPIF 2000). Habitat for these species are addressed throught the use of a Management Indicator Species (MIS), the sage grouse.

The pygmy rabbit, and a few open-canopy sagebrush associated species are discussed separately and effects are evaluated by alternative.

Letter Number *27 - Curlew DEIS* Comment ID 458

Comment: DEIS p. 3-34: "No surveys have been completed" for sensitive species: Pygmy rabbits and western big-eared bat. Neither have surveys been made for Sensitive Slick-spot Peppergrass, Cache Beardtongue, Starvling Milkvetch, Payson Bladderpod, or Spotted frog.

Response: The Forest Service Manual contains direction (2670) for the management of Sensitive Species. Currently, the pygmy rabbit has not been identified as a Sensitive Species, but has been identified as a potential species-at-risk.

As discussed in the EIS, there are only two sensitive species that have suitable habitat or ranges that extend onto the Grassland (Columbian sharp-tailed grouse and western big-earred bat). Both of these species are analyzed in the document and have been addressed again in the Biological Evaluation prepared for the Alternative H, the selected alternative in the Record of Decision (See Appendix J in the FEIS). This BE also includes documentation/rationale for why the other sensitive species have not been included in the analysis.

The Grassland Plan includes direction for the management of TES species and/or habitat (See Chapter 3, Wildlife Habitat Management).

Letter Number *27 - Curlew DEIS* Comment ID 474

Comment: DEIS p. 4-3 1: In that, "It is unknown how important the Grassland is for wintering sage grouse," No sagebrush treatments should be conducted until that importance is known.

Response: The Grassland Plan includes a goal to cooperatively map functional and degraded sage grouse breeding and winter habitat. It also includes guidelines to be incorporated at the site-specific project level to follow Guidelines, and to focus treatments on canopy cover greater than 25% (See Chapter 3, Wildlife Habitat Management).

Alternative H, the selected alternative in the Record of Decision, maintains the existing sagebrush canopy cover through the ten-year Plan period using a combination of light and heavy herbicide applications or mechanical methods. Vegetation treatments are prioritized in areas of the Grassland that are currently in greater than 25 percent canopy cover. This alternative also features adaptive management strategies and focused monitoring, including habitat mapping in cooperation with Idaho Fish and Game.

Category **Alternative G**

Letter Number *28 - Curlew DEIS* Comment ID 234

Comment: I am opposed to fencing 14 miles of riparian areas. First, there is not money to finance it with as CP money is already committed to completing the North Carter project for the next several years and the CP money is necessary to replace several miles of old fence every year to keep fences in good repair. Second, the Curlew H&C Association, along with the Forest Service, have fenced 9.3 miles into riparian pastures since 1995 with more planned in the future.

Response: The final EIS incorporates a new alternative, Alternative H. This is the selected alternative in the Record of Decision. Riparian corridor fencing has been reduced to about five miles on streams that have been assessed to be "at risk" from properly functioning condition to accelerate recover to PFC in these areas. We believe these are the streams that will benefit most from riparian corridor fencing. In addition, this alternative fences all other perennial streams, not already fenced into riparian pastures, into riparian pastures using existing fences were practical. Livestock utilization levels will be established in these riparian pastures based on the PFC status of the stream in the pasture.

Fencing was proposed in Alternative G to protect and enhance the riparian and aquatic resources within the Grassland. Fencing, even though there is an up-front construction cost and a maintenance cost, should be an overall benefit to the livestock permittees within the Grassland. Without fencing, intensive monitoring and management of livestock is required to meet the stated goals of riparian areas and stay within utilization and disturbance standards. Intensive monitoring and management is still required within riparian pastures, and once standards are met, livestock are moved from the pasture. Monitoring and management workloads are essentially eliminated in those areas where riparian areas are excluded from grazing. This ultimately reduces the required daily work load of the permittee and enhances the riparian and aquatic resources. Funding for the remaining fences can come from funds other than CP. When an alternative is ultimately selected to be implemented, specific funding sources for specific projects (such as fencing) will be determined at that time.

Category **Comment Noted**

Letter Number *28 - Curlew DEIS* Comment ID 237

Comment: This is why I ask Alternative A be the preferred alternative. This alternative has been in effect fo over ten years and has increased bird numbers, improved the pastures and the overall outlook o the CNG. The grasslands have come along way from the grazing and farming practices of the past and are better now than ever. Alternative A will allow for continued progress and will bene both the wildlife and grazing needs.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Alternative H, the selected alternative in the Record of Decision, balances existing grazing use with new issues and the needs for sage grouse habitat.

Letter Number *28 - Curlew DEIS* Comment ID 230

Comment: I am very much opposed to Alternative G in the DEIS for many reasons.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Category **Economics**

Letter Number *28 - Curlew DEIS* Comment ID 233

Comment: Alternative G will have a bad effect on the local economy of Oneida County, contrary to what the DEIS suggested. I was very much offended by the DEIS stating "the financially stronger livestock operators could benefit in the long term as the financially vulnerable operators are bought out or transfer their grazing permits. These permittees, or new operators, could pick up the vacant permits and expand their operations."

Response: Certainly, such a clinical statement does not fairly reflect the sadness and disappointment in communities and families that go along with the forced ownership transfer of a family-owned ranching business. We clearly understand that these are real people pouring their lives into a business and lifestyle that, for whatever reason, doesn't always work out. Ranching is more of lifestyle than a "job" or "career". In our attempt to to be scientifically objective, we regret any offense that may have been taken by findings disclosed in the DEIS.

The intent was to discuss an event that, regrettably, does at times occur in western agricultural operations and point out that this was a possible effect of a reduction in available permitted livestock grazing opportunity. NEPA requires disclosure of foreseeable effects caused by the alternatives. The DEIS mainly cited the risk that could occur and some potential effects, positive or negative. No prediction was made that this would occur for sure.

Consolidation of smaller agricultural or ranching operations into larger enterprises, with corresponding efficiencies and financial benefits, has occurred throughout the agricultural economy, regionally and nationally, for decades. Each event certainly is traumatic for the people involved but the results can potentially benefit other businesses who remain and expand operations.

The estimated economic effects on Oneida County are disclosed in Chapter 4, Economics section of the FEIS.

Category **Laws & Regulations**

Letter Number *28 - Curlew DEIS* Comment ID 235

Comment: Alternative G does not meet the requirements of the Bankhead Jones Farm Tenant Act of 1937 as it does not promote development of grassland agriculture.

Response: Title 3, Section 31 of the Bankhead Jones Farm Tenant Act states, "The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impairment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare, but not to build industrial parks or establish private or commercial enterprises."

Titles I, II and IV were repealed by Congress by the Agricultural Act of 1961. P.L.. 87-128. Title III, though not repealed, has been amended several times since 1937. In the 1960's, the Secretary of Agriculture issued three administrative orders involving the National Grasslands. The 1963 Order was perhaps the most significant since this order amended the management direction in the preceeding two orders. Section 213.1 of the 1963 Order in part states, "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use and to promote the development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas where the National Grasslands are a part."

The most significant Act affecting the National Grasslands, since the passage of the Bankhead-Jones Farm Tenant Act of 1937, was the enactment of the National Forest Management Act (NFMA) in 1976. Among other things, the Act requires the preparation of management plans for all units of the National Forest System of which National Grasslands are a part. In the early days the focus of National Grasslands was on the value of stabilized watersheds, the productive use of forage by livestock and the relationships of both to rural community stability. Since then, many other values have been added - oil, gas, uranium, and coal; open space vistas; cultural resources; recreation opportunities; wildlife habitat; enjoyment of native plants; threatened and endangered plant and animal species; outdoor laboratories; and solitude.

While the Preamble of the Act states that the primary purpose is to "secure occupancy of farms and farm homes," it is not an operative part of the Statute and does not preempt the direction found in the body of the legislation. Furthermore, the Curlew NG is assisting in securing occupancy of farms by providing low-cost forage for the members of the Curlew and Buist Grazing Associations.

All of the alternatives meet the intent of the BJFTA, especially if we consider the remarks of Congressman Jones, chief sponsor of the Act for the House. He noted that "these lands may be used for any public purpose such as parks, game preserves, recreational centers, forest reserves, or for any other public purpose." Thus, even Alternative D, which eliminates livestock grazing on the CNG, would meet the intent of the BJFTA.

Category **Vegetation**

Letter Number *28 - Curlew DEIS* Comment ID 231

Comment: Alternative G proposes to increase sagebrush canopy cover…(enclosed letters) they both support the fact that increased sagebrush will have an adverse affect on the sage grouse as we as the sharp-tailed grouse and other wildlife. There is an abundance of sagebrush, and to think that the grasslands need to be managed to increase sagebrush is just completely crazy and is not backed up by any scientific studies that have been done on the CNG.

Response: Alternative H, the selected alternative, proposes to manage Grassland resources to improve riparian areas "at risk" with corridor fencing and fencing other riparian areas into riparian pasture if they are not currently fenced into riparian pastures.

Vegetation treatments in the selected alternative are used to maintain the current percentage of acres in the existing canopy cover classes. Treatment wouls be focused in areas where sagebrush canopy cover is in greater than 25 percent to improve understory production and maintain sage grouse nesting and brood-rearing habitat in the 16-25 percent sagebrush canopy cover class. A combination of light to heavy herbicide applications and mechanical methods would be used on approximately 9,600 acres. An additional 2,500 acres of bulbous bluegrass would be treated using prescribed fire, plowing and reseeding or other appropriate methods to improve understory diversity. Monitoring activities should help us to understand how sage and sharp-tailed grouse are using the Grassland. As we learn more we may be able to adjust treatments over time to better respond to wildlife and livestock production needs.

The alternatives propose an array of treatments and vary in the distribution of sagebrush canopy cover at the end of 10 years.

The effects of vegetation changes on wildlife species are detailed in the Wildlife Habitat section of Chapter 4 in the EIS.

Category **Wildlife**

Letter Number *28 - Curlew DEIS* Comment ID 232

Comment: The DEIS states that sage grouse in the West has been declining. However, it displays no evidence that sage grouse on the CNG are declining. In fact, by the counts of the Malad District Ranger and the Gardner Report, the grouse numbers and leks are higher than ever before. So why are we trying to fix a problem that doesn't exist? I ask you to send me a report that shows that the sage grouse numbers are declining in the CNG. As of yet, I have not seen any studies or documents that support this.

Response: In reviewing IDFG monitoring information on sage grouse lek attendance, data indicate that based on mean number of male sage grouse per lek, when looking at the long-term trend over 20-30 years, sage grouse populations are on a downward trend over the Greater Curlew Valley Area. Because the CNG comprises only 9% of the GCVA and is broken into 3 distinct units, it is difficult to look at population trends on just the CNG. FS District lek attendance data and field observations suggest that while the mean number of males per lek has declined, the overall number of leks has increased.

Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

This issue has been addressed further in the Final EIS in Chapter 3, Appendix I, and Appendix J.

Letter Number *28 - Curlew DEIS* Comment ID 236

Comment: Why is the Forest Service so willing to put at risk the management plans of the past that have increased the sage grouse numbers and other wildlife when there is no clear evidence that increased sagebrush, native grasses, and fencing off riparian areas will have a positive effect o the bird numbers?

Response: Additional information has been included in the FEIS on sage grouse population trends. See Appendix I for more information.

In reviewing IDFG monitoring information on sage grouse lek attendance, data indicate that based on mean number of male sage grouse per lek, when looking at the long-term trend over 20-30 years, sage grouse populations are on a downward trend over the Greater Curlew Valley Area. Because the CNG comprises only 9% of the GCVA and is broken into 3 distinct units, it is difficult to look at population trends on just the CNG. FS District lek attendance data and field observations suggest that while the mean number of males per lek has declined, the overall number of leks has increased.

Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

Alternative H, the selected alternative in the Record of Decision, incorporates guidelines for sage grouse habitat management which focus on improving understory vegetation diversity and maintaining the number of acres in greater than 15% sage brush canopy cover, a key component of the sage grouse life cycle. Riparian fencing focuses on improving water quality and stream conditoins that are currently assessed as being "at risk" to accelerate recovery. All other perennial streams, not currently in riparian pastures, will be fenced into riparian pastures using existing fences where practical. Livestock utilization levels in riparian pastures will be based upon the PFC status of the stream in the pasture.

Category **Comment Noted**

Letter Number *29 - Curlew DEIS* Comment ID 238

Comment: I have been very concerned when the sage grouse has seemed to take precedence over the grasslands which were set up primarily to graze cattle.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. Generally the decision maker chooses the alternative which best meets the Purpose and Need. The Record of Decision discloses and explains the reasoning behind his choice of alternatives.

Sage grouse habitat is one of the significant issues and according to NEPA, we must develop alternatives to address those issues. In addition, the NFMA requires that we maintain viability for wildlife species. Since sage grouse numbers west-wide are declining, the Forest must insure its management is not contributing to a loss of viability.

Alternative H, the selected alternative in the Record of Decision, balances grazing use and sage grouse habitat needs.

Category **Wildlife**

Letter Number *29 - Curlew DEIS* Comment ID 239

Comment: In speaking with past Forest Service employees who have watched and studied the leks of the sage grouse as well as the number of birds, they say the numbers have not changed very much over the past 40-50 years. My feeling is that the cattle and the sage grouse have been very compatible with each other so why all of this concern.

Response: The final EIS includes additional information on sage goruse population trends. Appendix I contains a comprehensive review of population trends and causes of declines. Some of this information has been included in the Wildlife Habitat Management Section of Chapter 3, as well.

Under current law the Idaho Fish & Game Department is responsible for managing huntable wildlife populations while the Forest Service is responsible for maintaining adequate quantity and quality of habitat, in cooperation with State Fish & Game, to meet huntable population objectives. Historically, the Forest Service has relied on population numbers provided by State Fish and Game surveys and monitoring efforts. Population numbers are estimates and while these estimates may not reflect the actual numbers of birds, some reasonable predictions can be made on the trends of a given population.

In reviewing IDFG monitoring information on sage grouse lek attendance, data indicate that based on mean number of male sage grouse per lek, when looking at the long-term trend over 20-30 years, sage grouse populations are on a downward trend over the Greater Curlew Valley Area. Because the CNG comprises only 9% of the GCVA and is broken into 3 distinct units, it is difficult to look at population trends on just the CNG. FS District lek attendance data and field observations suggest that while the mean number of males per lek has declined, the overall number of leks has increased.

Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

Category **Comment Noted**

Letter Number *3 - Curlew DEIS* Comment ID 116

Comment: Wow, I can't believe Alternative G is the preferred alternative. I hope politics allow you to stick with it. I think fencing and strictly enforced utilization is necessary if you expect to control grazin along riparian areas. This will greatly improve the ecological health of the grasslands.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Based on public comments on the Draft EIS, the ID Team developed Alternatiev H, the selected alternative in the Record of Decision. This alternative is a combination of Alternatives F and G.

Letter Number *3 - Curlew DEIS* Comment ID 117

Comment: Congratulations on making a gutsy and ecologically sound decision for the preferred alternative.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative H, the selected alternative in the Record of Decision, is a combination of Alternatives F and G. It was developed by the ID Team in response to public comments on the Draft EIS. We believe Alternative H balances grazing use with the needs of sage grouse, improves riparian areas, and uses adaptive management strategies and monitoring to help us better understand the importance and significance of the Grassland and its uses.

Category **Economics**

Letter Number *3 - Curlew DEIS* Comment ID 112

Comment: The economic analysis is difficult to understand (especially Chapter 3) and appears faulty. For example, Fig. 3.4 shows farm income in 1994 in negative numbers. Did farms provide no income, and in fact cost the county $500,000? I doubt it.

Response: We believe we have improved the readability of the analysis findings in the FEIS. Nevertheless, economic analysis can be difficult to understand under the best of circumstances or presentations. Farm Income refers to that industrial sector of the Oneida County economy. The data used were from annual Employment and Income reports compiled by the Bureau of Economic Anaysis in U.S. Department of Commerce.

Letter Number *3 - Curlew DEIS* Comment ID 111

Comment: Livestock bias persists in the document. The direct benefit of range cattle grazing is highlighted in the economic analysis in the affected environment, but no mention of the cost to manage them, the pittance paid for the privilege to graze, or the benefit not grazing to other resources. The economic analysis needs to consider the benefit of improving habitat for wildlife. Have you ever been in Malad's stores and cafes the opening morning of bird season? They're swamped. Then there are big game seasons. During the grouse courtship displays human visitors also flock to that area. If habitat is improved, more economic benefit will be gained than lost. Idaho F&G asked for an analysis of visitor/hunter days during the alternative development comment period. Was this done? Why not?

Response: The economic analysis only addressed resource inputs for which a tangible market value could be assigned, such as the grazing fees, burning costs, revegetation, etc. It did not include derivec economic values of non-market resource inputs, such as benefits if recreation or wildlife. The costs of administration of the Grassland, including those of administering cattle allotments were included in the EIS. Appendix B, Economic Efficiency Analysis, describes the methodology, assumptions, and input variables for each alternative.

The benefits of local and regional economic activity stimulated by management policies on the Grassland are not analyzed in the economic efficiency analsyis but are addressed in an Economic Impact Analysis. This method focuses on the multiplier effects of relative Grassland management actions on industrial sectors, such as the stores and cafes in Malad mentioned in the commentor's letter. In this example, these economic effects would accrue to the Retail industrial sector. An expanded Economic Impact Analysis was conducted for the FEIS and can be found in Chapter 4, Economics. This analysis includes effects on hunting and recreation visitor days, plus other activities, in addition to grazing or other management activities. The complete documentation of the nalysis process can be found in the FEIS, Appendix B.

Category **Revised Plan**

Letter Number *3 - Curlew DEIS* Comment ID 114

Comment: I fear the strict use of 75 and 150 feet as distances from the stream to manage riparian areas may be taken too literally. We need to include oxbows and land between stream meanders. Allow some flexibility in lateral distance without compromising the intent.

Response: Riparian Wetland Areas (RWAs) are portions of watersheds where riparian-dependent resource receive primary emphasis, and management activities are subject to specific standards and guidelines. The 75 and 150 ft. widths are not exact thresholds, but serve to guide managers in determining widths generally needed to protect RWA values. These widths may vary somewhat depending on a variety of local factors. The intent of establishing the RWAs is NOT to maintain an exact width, but to maintain those areas that are considered to be in "good" condition, and restore those areas that are in a deteriorated condition. The ability of any specific RWA to provide these needs will vary site-by-site. When fence-lines are located, consideration will be given to any oxbows or other features that may be related to the stream channel, riparian area and/or wetland. In some locations, where site-specific situations warrant, the RWA distances may be adjusted to ensure resource values are protected and to facilitate fence construction needs.

Letter Number *3 - Curlew DEIS* Comment ID 113

Comment: I noticed the reduction in numbers of livestock would be reduced after AMPs were completed. This is concerning as the AMPs could take years to complete. Use the analysis already done to expedite the AMP revision process and put an aggressive due date on the AMP revisions. Perhaps there are other avenues for getting AMPs to fruition quickly. Investigate them.

Response: Grazing use standards in the Final Grassland Plan will be included in grazing permits immediately, and livestock will be managed to the new standards.

The Grassland planning process will not actually reduce numbers or modify numbers in any way. This site-specific decision is outside the scope of this EIS and decision. Any changes in numbers are only an estimate of the effects of implementing each alternative on livestock grazing numbers. The range of capacity within each alternative actually displayed that in many alternatives, it was possible numbers could increase or remain unchanged. Nevertheless, no changes in numbers will occur with the issuance of this final Plan. This was clearly stated in the Chapter 4 section where the estimated head-months were disclosed.

However, the programmatic direction in this Plan and Record of Decision (ROD) will set the standards within which future capacity will be established through site-specific allotment management planning. Through this, livestock numbers will be more accurately established with consideration of site-specific conditions. However, they may be reduced, unchanged, or even increase once the site-specific process determines whichever is appropriate.

Category **Wildlife**

Letter Number *3 - Curlew DEIS* Comment ID 115

Comment: It disturbs me that wildlife, except grouse, are hardly referenced in the environmental consequences section. It is up to the reader to make conclusions from reading about the predicted changes in habitats. Please send me the specialist report for the fisheries and wildlife resources. I suggest the specialists reports be available if the FEIS is to be abbreviated like the DEIS. Are fisheries even mentioned in the DEIS. Which streams are fish bearing?

Response: The EIS analyzes effects on threatened, endangered and sensitive species. In addition, Management Indicator Species MIS) and species-at-risk (SAR) are discussed. Selection of MIS and SAR is discussed in the Wildlife Habitat Management Section of Chapter 3 and effects on these species and habitats are found under each alternative discussion under Wildlife Habitat Management in Chapter 4.

Fish are addressed in the EIS on pages 3-74, and indirectly as a function of riparian and aquatic habitat under the Riparian/Wetland Areas Section of each alternative in Chapter 4. In addition, the Biological Evaluation in Appendix J contains a complete evaluation of the effects of Alternative H, the selected alternative in the Record of Decision, on fisheries habitat.

Category **Alternative G**

Letter Number *30 - Curlew DEIS* Comment ID 249

Comment: I am opposed to the changes you propose in the Draft EIS Alternative G because I believe it will have an adverse effect on the sage grouse population and other wildlife species.

Response: Effects of Alternative G on sage grouse and other wildlife species are disclosed in Chapter 4 of the EIS.

Category **Comment Noted**

Letter Number *30 - Curlew DEIS* Comment ID 252

Comment: I realize there are many radical environmentalists who want to blame cows for everything and would do anything to see them all gone. But facts, reason, and common sense say it is working now, why not leave it alone?

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Alternative H, the selected alternative in the Record of Decision, balances grazing and new issues.

Category **Economics**

Letter Number *30 - Curlew DEIS* Comment ID 251

Comment: I also believe you have grossly underestimated the economic impact on Oneida County and the Curlew Valley residents.

Response: The final EIS includes an updated Economic and Social section in Chapter 3 and an improved and updated Effects analysis in Chapter 4. Appendix B documents the methodolgy used in the economic analysis. We have attempted to use more local information in the update of the economic analysis in the final EIS.

Category **Wildlife**

Letter Number *30 - Curlew DEIS* Comment ID 250

Comment: From all reports I have seen, sage grouse numbers are increasing in the Curlew Grasslands. The current management plan of multiple uses addressed all the needs of wildlife and grazing.

Response: Under current law the Idaho Fish & Game Department is responsible for managing huntable wildlife populations while the Forest Service is responsible for maintaining adequate quantity and quality of habitat, in cooperation with State Fish & Game, to meet huntable population objectives. Historically, the Forest Service has relied on population numbers provided by State Fish and Game surveys and monitoring efforts. Population numbers are estimates and while these estimates may not reflect the actual numbers of birds, some reasonable predictions can be made on the viability of a given population.

In reviewing District monitoring information on sage grouse populations, data indicate that although sage grouse populations appear to cycle up and down over time, when looking at the long-term trend line over 10-20 years, sage grouse populations are on a downward trend over th Greater Curlew Valley Area. Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

This issue has been further addressed in Chapter 3, Appendix I and Appendix J of the EIS.

Category **Form letter**

Letter Number *31 - Curlew DEIS* Comment ID 333

Comment: Comments in this letter are the same as comments in Letter #52. Please refer to Letter #52 from comments and responses.

Response:

Category **Form letter**

Letter Number *32 - Curlew DEIS* Comment ID 334

Comment: Comments in this letter are the same as comments in Letter #52. Please refer to Letter #52 from comments and responses.

Response:

Category **Alternatives**

Letter Number *33 - Curlew DEIS* Comment ID 253

Comment: I certainly hope that we will be able to have multiple use of the grasslands. I believe it has worked well for some time and has been beneficial for the sage grouse as well as other wildlife species and has also been beneficial for the area as grazing has been permitted. I feel it has been for beneficial use in keeping foliage under control which certainly needs to be done with forest fires a major concern after the record-breaking fire destruction last year. We certainly do not want any greater destruction from wild fires.

Response: Based on public comments on the DEIS, the ID Team developed Alternative H, the selected alternative. This alternative would maintain the current percent of acres in each sagebrush canopy over class over the 10-year plan period through a variety of vegetation treatments. In addition, upland utilization levels would be established at 50 percent grassland-wide with further refinement in Allotment Management Plan updates. Corridor fencing would be reduced and applied only on "at risk" streams (approximately 5 miles) that would benefit from fencing. The remaining perennial streams would be fenced into riparian pastures using existing fences where feasible. Riparian livestock utilization would be determined based on the properly functioning condition of the stream. Those streams that are non-functioning would be grazed using light utilization standards, while those streams in properly functioning condition would be grazed at a level that maintains properly functioning condition.

We agree that we do not want destructive fires, and all wildland fires on the Grassland will be aggressively suppressed under all alternatives. However, wildland fires will never be completely eliminated from the Grassland regardless of how it is managed.

Multiple use management remains an important part of the overall Forest Service policy on the Grassland and throughout the Caribou-Targhee National Forest.

Category **Comment Noted**

Letter Number *34 - Curlew DEIS* Comment ID 258

Comment: Some of the data used in the DEIS was prepared by people who want to remove cattle from the grasslands. It makes me wonder if they know where the good hamburgers they eat come from.

Response: Thank you for your comment. We regret that you feel there is significant bias in the EIS. The Interdisciplinary Team is made up of people from various disciplines with many years of professional knowledge and experience. To show our objectivity, we have only drawn conclusions where we have studies, data or site-specific information to substantiate them. Also, we have used many different sources for our information on vegetative conditions, wildlife population trends, etc. instead of relying on only one source. The FEIS contains additional information and current site specific analysis to further substantiate our effects analysis.

In addition, the project record includes comments received from the public through public involvement activities during the planning process and how those comments were used to identify issues. The project record also links together how these public issues and concerns were used to develop the alternatives in the EIS.

Letter Number *34 - Curlew DEIS* Comment ID 259

Comment: Alternative A has been in use for many years. I think it is good for the rancher, the hunter, the sage grouse, and all other wildlife. Let's dot destroy a good thing.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Alternative H, the selected alternative in the Record of Decision, balances grazing and new issues, such as sage grouse needs.

Category **Economics**

Letter Number *34 - Curlew DEIS* Comment ID 254

Comment: [Preferred Alternative G] will have an adverse effect on the economic stability of Oneida County. Ranchers pay a percent of the taxes and if the land is reverted back to sagebrush there will be no grass for the cattle. In the long run the rancher will be forced out of business and his livelihood will be ruined along with the loss of revenue from Oneida county. I believe people and their livelihoods are more important than sage grouse.

Response: The economic effects of all alternatives are displayed in the FEIS, Chapter 4, Economics effects section. The effects of various vegetation treatment proposals by alternative are disclosed in the Vegetation section of the same chapter.

Category **Vegetation**

Letter Number *34 - Curlew DEIS* Comment ID 256

Comment: Let's not revert back to the old days by planting sagebrush. Sagebrush grows back fast enough without planting it.

Response: Alternative H proposes to use native and desirable non-native grasses, forbs and shrub seed mixes, some of which are listed in Appendix C of the Grassland Plan. Other native and non-native species not listed in Appendix C of the Plan will be considered at the site-specific project level.

Alternative H provides the flexibility to include sagebrush in a seed mix on treatment sites if site-specific analysis indicates including sagebrush seeds would meet the objectives of the Grassland Plan.

Category **Wildlife**

Letter Number *34 - Curlew DEIS* Comment ID 255

Comment: Besides, according to the Forest Service reports the sage grouse numbers are at a high. All things in nature run in cycles and maybe they are down in numbers some years. Hunting and predatory animals can certainly have an effect on the sage grouse. Just like a drought, diseases, and environmentalists can have a bad effect on the rancher.

Response: The Final EIS includes additional information on sage grouse population trends. Appendix I contains a comprehensive review of all data available at the time of this analysis. Some of this information is also included in Chapter 3 under the Wildlife Habitat Management Section. While hunting seasons and predator management are outside the scope of this analysis, Chapter 3 of the EIS contains some informaiton regarding these activities.

Letter Number *34 - Curlew DEIS* Comment ID 257

Comment: Alternative G will have negative effect on other wildlife because they need grass to eat, not sagebrush.

Response: Effects on wildlife species that were analyzed are disclosed in Chapter 4 of the EIS under each of the Alternative discussions. Alternative H, the selected alternative in the Record of Decision, maintains the existing sagebrush canopy cover using light and heavy herbicide treatments or mechanical methods. Vegetation treatments are prioritized in areas of the Grassland that are is greater than 25 percent canopy cover. This method of treatment allows greater control in creating a mosaic of sagebrush canopy cover classes to meet the needs of all wildlife species that depend on sagebrush for all or a part of their life cycle.

Effects on large herbivores, mule deer and elk have not been analyzed in the EIS, because the public did not identify this as an issue during public scoping and subsequent comment opportunities. These species spend a minimal amount of time on the Grassland, are habitat generalists, and are not considered to be at risk. For this reason, they were not analyzed as management indicator species. Smaller herbivores which were identified as being at risk, were analyzed, including the pygmy rabbit, which eats sagebrush. Besides sage grouse, species that may forage on grass seed include Brewer's sparrow and sage sparrow. Sage grouse have bee used to predict effects on these species.

Category **Alternative G**

Letter Number *35 - Curlew DEIS* Comment ID 229

Comment: One of the decision that I find most disconcerting is that currently Forest Service range management seems to be fixed on the idea of fencing all riparian areas. This is not beneficial to the stockmen or the environment and there are proven alternatives.

Response: Fencing all riparian areas throughout the National Forest System is neither practical nor cost-effective. The Forest does not propose unilateral fencing of all riparian areas. However, given the relatively flat terrain, the configuration of the pastures and the overall condition of the riparian areas within the Grassland, fencing is a viable alternative for this area.

The selected alternative (Alt H) would corridor fence "at risk" streams (approximately 5 miles). The remaining perennial streams would be fenced into riparian pastures using existing pasture fences where feasible.

Fencing, even though there are up-front construction and continuing maintenance costs, should be an overall benefit to the livestock permittees within the Grassland. Without fencing, intensive monitoring and management of livestock is required to meet the stated goals of riparian areas to stay within utilization and disturbance standards. Intensive monitoring and management is still required within riparian pastures, but once standards are achieved, livestock are moved from the pasture. Monitoring and management workloads are essentially eliminated in those areas where riparian areas are excluded from grazing. This ultimately reduces the required daily work load o the permittee and enhances the riparian and aquatic resources.

Category **Alternatives**

Letter Number *35 - Curlew DEIS* Comment ID 223

Comment: In general, the problem is that none of the alternatives presented in the Draft EIS really present a practical approach to solving the problem.

Response: We do not agree. While some changes may be necessary with implementaion of the Selected Alternative, we believe they will be practically applied.

Based on public comments on the DEIS, the ID Team developed Alternative H, the selected alternative. This alternative would maintain the current percent of acres in each sagebrush canopy over class over the 10-year plan period through a variety of vegetation treatments. In addition, upland utilization levels would be established at 50 percent grassland-wide with further refinement in Allotment Management Plan updates. Corridor fencing would be reduced and applied only on "at risk" streams (approximately 5 miles) that would benefit from fencing. The remaining perennial streams would be fenced into riparian pastures using existing fences where feasible. Riparian livestock utilization would be determined based on the properly functioning condition of the stream. Those streams that are non-functioning would be grazed using light utilization standards, while those streams in properly functioning condition would be grazed at a level that maintains properly functioning condition.

Category **Comment Noted**

Letter Number *35 - Curlew DEIS* Comment ID 226

Comment: At every public meeting there is continuous rhetoric about the potential listing of the sage grouse. Evidently, a petition has been drafted in the State of Washington. Yet none of the permittees have seen this petition, if it exists at all. If the document has been generated with the use of public money or submitted to a government agency, it is a public document and I hereby request to see it.

Response: The Washington population of the western sage grouse was petitioned to be listed by the Northwest Ecosystem Alliance and Biodiversity Legal Foundation on May 14, 1999. The USFWS reviewed the petition and concluded that listing as threatened was warranted, but precluded by higher priority listing actions (April 30, 2001).

Sage grouse habitat is one of the significant issues and according to NEPA, we must develop alternatives to address those issues. In addition, the NFMA requires that we maintain viability for wildlife species. Since sage grouse numbers west-wide are declining, the Forest must insure its management is not contributing to a loss of viability.

Category **Miscellaneous**

Letter Number *35 - Curlew DEIS* Comment ID 228

Comment: Allow permittees to participate in the alternative development and selection parts of the EIS process…we would like to work with you to identify areas within the 39,000 acres in the CNG where additional leks could best be located… let's work together to find good locations for more viable leks and allow moderate grazing of the rest of the CNG as we build a balanced and sustainable ecosystem.

Response: In response to your suggestion regarding lek locations, lek locations are not generally thought to be limiting. Rather, nesting, brood-rearing and winter habitat are more restrictive. Lek locations are in open areas, where visibility of displaying males is good. These areas may be found on open ridgetops, on salting areas or around water troughs, or in a few cases even on roads. BH

By law, the Forest Service has the responsibility for proposing a management action and providing ample public scoping so the public can raise issues regarding the proposed action. Generally speaking, two alternatives (the No Action, Alternative A and the Proposed Action, Alternative B) are considered the starting point for public discourse on a preferred course of action. In the Grassland process, the proprosed action (Alternative B) was developed based on the Initial Analysis of the Management Situation which was released in April, 1999.

Through the public scoping period and subsequent public meetings, the Forest Service received and analyzed public comments regarding these two initial alternatives. As a result of public comments, three significant issues were identified - riparian and watershed management, vegetation and wildlife management, and social and economic factors.

The Forest Service developed eight alternatives, including the No Action (Alternative A) and the Proposed Action (Alternative B) that address these issues in various ways. Some alternatives are more responsive to traditional uses, such as livestock grazing, while others are more responsive to amenity values, such as wildlife. The objective of the planning process is to identify an alternative that addresses all of the issues in a way that resolves most, if not all of the conflicts identified through public comments.

In that regard, the Forest Service initially identified Alternative G as the "Preferred Alternative" in that it resolves the needs of wildlife by meeting state sage grouse guidelines while providing for the continuation of traditional uses, albeit at a reduced rate. The selected alternative (Alternative H) was developed based on public comments on the Draft EIS. It combines features of Alternative F and Alternative G that responds to the public comments we received.

The Grassland plan provides many oportunities for cooperation with users, adjacent landowners and adjacent land management agencies. In particular, the monitoring plan (Chapter 5 of the LRMP) is an excellent way for interested parties to remain involved in the management of the Curlew NG. We encourage and invite your participation in monitoring the outcome of the selected alternative to determine if goals, objectives, standards and guidelines in the Curlew Resource Management Plan are being met and resource conditions are acceptable.

Letter Number *35 - Curlew DEIS* Comment ID 227

Comment: I would like to take a more positive approach by making some recommendations that I think will lead to a long range, scientifically defensible, ecologically balanced and above all amicable solution:

Engage is a multi-stage balanced consultation process similar to that used by the USFWS other places such as the negotiations at the Cutler Reservoir in Utah. Give interested parties a place at the table and facilitate an objective and balanced solution.

Response: We have participated in and followed the progress of the Sage Grouse working group that somewhat paralleled this planning process. The working group is composed of a broad cross section of agencies and individuals interested in grouse and their habitat. Working group guidelines and other information have been used extensively throughout the development of the Curlew plan. Efforts have been made to involve and engage many of the interested parties who can provide expertise on management of the Grassland and its resources.

The monitoring plan (Chapter 5 of the LRMP) provides an excellent opportunity to bring diverse groups together to determine if goals, objectives, standards and guidelines are being met. We encourage continued participation by interested people in the management of the Curlew NG.

Category **Wildlife**

Letter Number *35 - Curlew DEIS* Comment ID 225

Comment: The CNG permittees, myself included, do not see how a single article which has not even been officially published, can be instantly made into public policy. It has had not opportunity for public scrutiny and certainly has not followed any protocol for promulgation into policy at the State level….

Response: For this analysis, Connelly, et al, (2000) was used, because these guidelines are the most recent, peer-reviewed published guidelines for sage grouse. As the Grassland Plan states, we will use current guidelines to develop site-specific recommendations at the project level.

The USFS has signed a MOU (2001) with the Western Association of Fish and Wildlife Agencies, BLM and USFWS to direct conservation efforts for sage grouse and sagebrush. This MOU guides sage grouse conservation planning, formulates state working groups and establishes a framework team to provide assistance and insure consistency. The Idaho State Working Group has not met yet, but it is believed that they will be looking at the Idaho Sage Grouse Conservation Plan (1998) to see how well it meets the intent on the MOU, and also looking at recent published information, including Connelly et al (2000) and then also incorporating information from the framework team. If the State Working Group is successful in completing new guidelines in a few years, these will then be used as guidance for future activitie

Letter Number *35 - Curlew DEIS* Comment ID 224

Comment: None of the alternatives offer an approach that will provide a sustained ecologic balance…balanced restoration of flora and fauna within the ecosystem is not discussed as a goal.

We are only told that the objective is to comply with Sage Grouse Management Guidelines that have been adopted by the State of Idaho. In fact, no such guidelines exist. The Fish and Game are basing their entire premise on an article by Connelly, et.al. published in Wildlife Society Bulletin. This article was in the process of being published earlier this month and had not been available for review even in draft form until earlier this month.

Response: The goal of management for sustainable grasslands has been incorporated in several ways. It is identified as a Need for Change during the AMS process (See Chapter 1 of the FEIS). It is also identified in the Desired Future Conditions.

Alternative A proposes an ecological balance of sagebrush canopy cover for each of the canop cover classes. Alternative F and H propose a balance of sagebrush canopy cover that will trenc vegetation toward a condition that would be more resilient to disturbance. Each of the alternatives includes a Desired Future Condition for sagebrush canopy cover, wherein some alternatives strive to achieve a balanced mix of canopy covers and others move canopy cover toward higher densities to respond to wildlife concerns, such as sage grouse.

Connelly, et al (2000), guidelines were available in draft form during development of the Draft EIS. These guidelines were used with the understanding that there could be some minor changes as a result of peer-review. These Guidelines are the most current, peer-reviewed guidelines for the management of sage grouse habitat and populations. The Grassland Plan includes a guideline to use the most recent guidelines when planning vegetation treatments. The guideline does not specify Connelly, et al, because during the life of the plan, there could be more current site-specific guidelines developed (Curlew Working Group).

Letter Number *35 - Curlew DEIS* Comment ID 993576687

Comment: In fact, Department of Fish and Game records show significant increases in sage grouse populations in recent years. Hunting is still permitted even though a major concern has been the potential listing of the species as threatened…

Response: The Final EIS includes additional information on sage grouse population trends. Appendix I contains a comprehensive review of all information available at the time of this analysis. Some of this information is also presented in Chapter 3, Wildlife Habitat Management Section.

While hunting is outside the scope of this analysis, it should be noted that under current law the Idaho Fish & Game Department is responsible for managing huntable wildlife populations while the Forest Service is responsible for maintaining adequate quantity and quality of habitat, in cooperation with State Fish & Game, to meet huntable population objectives. Historically, the Forest Service has relied on population numbers provided by State Fish and Game surveys and monitoring efforts. Population numbers are estimates and while these estimates may not reflect the actual numbers of birds, some reasonable predictions can be made on the trends of a given population. (LW)

In reviewing IDFG monitoring information on sage grouse lek attendance, data indicate that based on mean number of male sage grouse per lek, when looking at the long-term trend over 20-30 years, sage grouse populations are on a downward trend over the Greater Curlew Valley Area. Because the CNG comprises only 9% of the GCVA and is broken into 3 distinct units, it is difficult to look at population trends on just the CNG. FS District lek attendance data and field observations suggest that while the mean number of males per lek has declined, the overall number of leks has increased.

Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

Category **Comment Noted**

Letter Number *36 - Curlew DEIS* Comment ID 149

Comment: Our recommendation is for Alternative C in the Draft EIS. Alternative C is preferred because it emphasizes the management of sagebrush habitats for sage grouse and other obligate species…Alternative C also sets a much needed standard for livestock forage utilization that is the key to rapid recovery of a sick landscape as well as depressed sage grouse populations.

We have no problem with livestock grazing ….as long as grazing is consistent with sage grouse habitat and riparian recovery goals. Without question, grazing pressure will have to be reduced from present levels or else managed in new and innovative ways to meet these objectives.

We feel Alternative C will provide the most expedient method of rehabilitating and restoring sagebrush steppe and riparian habitats needed to accomplish this recovery.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative H, the selected alternative in the Record of Decision, proposes adaptive management strategies and focused monitoring to help us better understand how wildlife species, including th sage grouse, use the Grassland. Sage brush canopy cover would be managed to maintain the existing canopy cover Grassland-wide. Treatments would be priortized in areas where canopy cover is greater than 25 percent. Livestock utilization would be flexible in that areas important to sage grouse nesting and brood-rearing would be grazed lighter while areas dominated with crested wheatgrass could be grazed heavier to maintain the vigor of crested wheatgrass stands Monitoring would include annual utilization monitoring on key areas as well as livestock utilization mapping.

Category **Alternative G**

Letter Number *37 - Curlew DEIS* Comment ID 305

Comment: One last thing that needs serious consideration is the proposal to fence riparian areas. Riparian areas are improving. Maybe the condition is not as good as someone wants it but believe me it has improved. The fences may improve things a little faster, but the problems created from scattered wire in 20-30 years is much more significant than the few years longer it may take to heal the riparian areas. One of the serious problems still noted today is the wire left behind from the farming days. It makes no sense to place more wire on the grassland and add to an existing problem.

Response: Abandoned fences are a problem throughout the Curlew Valley. Downed wire can be a hazard t both man and animals. The purpose of fencing riparian areas is not to create more wire hazards but to protect an important resource. If an alternative is selected that includes the installation of additional fencing to protect riparian resources, these fences will be maintained. If some time in the future they are determined to be unnecessary, they will be removed. They will not be allowe to become in a state of disrepair where they will become another hazard.

Category **Alternatives**

Letter Number *37 - Curlew DEIS* Comment ID 302

Comment: The proposed Alternative G is designed with sage grouse as the main objective and other uses are being displaced. Alternative A meets all the objectives of multiple use and has proven to increase conditions. It doesn't make sense to drastically change ideas and a plan that is working

Response: The AMS and purpose and need (EIS, Chapter 1) identified some areas within which the current management described in Alternative A was not meeting resource needs, particularly in riparian and watershed conditions. Alternative G attempts to balance the needs of the sage grouse, and the need to restore riparian function in some areas, with providing traditional goods and services under our Multiple Use mandate.

Based on public comments on the DEIS, the ID Team developed Alternative H, the selected alternative. This alternative would maintain the current percent of acres in each sagebrush canopy over class over the 10-year plan period through a variety of vegetation treatments. In addition, upland utilization levels would be established at 50 percent grassland-wide with further refinement in Allotment Management Plan updates. Corridor fencing would be reduced and applied only on "at risk" streams (approximately 5 miles) that would benefit from fencing. The remaining perennial streams would be fenced into riparian pastures using existing fences where feasible. Riparian livestock utilization would be determined based on the properly functioning condition of the stream. Those streams that are non-functioning would be grazed using light utilization standards, while those streams in properly functioning condition would be grazed at a level that maintains properly functioning condition.

It should be noted that only about 6,000 acres of sagebrush , not the 18,000 acres in Alternative A, have been treated over the last ten to fifteen years due to constraints such as drought, water and air quality concerns, wildlife needs, and other emerging issues during this period of time. Of the alternatives proposed, Alternative B, the Proposed Action, more nearly reflects actual management tahat has occurred on the Grassland over the past decade, while incorporating ne management standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon the Forest Service to insure the planning process uses the best available information in formulating management proposals for the future.

Category **Comment Noted**

Letter Number *37 - Curlew DEIS* Comment ID 297

Comment: I have lived in Curlew Valley for over 80 years and have seen many changes on the land during my life. During the 1920s and 30s everything that could be farmed was farmed….to say the least, things were tough and a person felt fortunate to survive.

Response: Thank you for your comment. Your comment demonstrates the world around us is not static but dynamically changes to environmental and human factors.

It is important to know that Grassland resources were drastically altered prior to acquisition of this area by the government. Overall, long-term trends have been upward, as shown in the DEIS. Resource conditions are based on the current and past management and are depicted in the Affected Environment of the EIS.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Letter Number *37 - Curlew DEIS* Comment ID 300

Comment: The new plan you are proposing is trying to change an idea that has been working for many years. The increase of fences, increase in sagebrush and decrease in grazing numbers will create a hardship on people that depend on ranching for a living.

Response: Thank you for your comment. NEPA requires that an Agency develop alternatives to the proposed action to address significant issues, socioeconomics was only one of those issues. A of the alternatives will improve and maintain CNG resources and affect people's lives to greater or lesser degrees. The alternatives were analyzed in the EIS and their effects on the resources were displayed.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns.

The decision maker can choose any of the alternatives or a combination of them. Generally the decision maker chooses the alternative which best meets the Purpose and Need. The Record of Decision discloses and explains the reasoning behind his choice of alternatives.

Letter Number *37 - Curlew DEIS* Comment ID 303

Comment: Sharp-tailed grouse have been considered unique to this area and in short supply elsewhere. For many years it was always talked about that sharp-tailed grouse would be listed as endangered species. I read in the paper last summer the sharp-tailed grouse is not going to be an endangered species. It will continue as is.

Response: The sharp-tailed grouse life history and habitat requirements are displayed in Chapter 3 of the EIS and is based on the most site specific, current literature available.

You are correct. The Columbian sharp-tailed grouse was petitioned to be listed by the Biodiversity Legal Foundation. The review by the USFWS showed that some of the smaller, isolated populations are at risk of extinction, but there are numerous larger populations of the species that are relatively secure and possibly increasing. They determined that Columbian sharp-tailed grouse were not warranted for endangered species act protection (October 11, 200 news release).

Category **Vegetation**

Letter Number *37 - Curlew DEIS* Comment ID 299

Comment: From what I can understand from your plan, it is to grow more sagebrush that is out there now. This would be a great mistake….Most grass fires can be controlled with fire trucks and farm equipment, but add sagebrush and wildfire becomes much more difficult to control. With a major wildfire, many private homes and farmland (crops) will be in jeopardy because you choose to grow more sagebrush. Consider how you would feel if your neighbor created a fire hazard next to your home.

Response: Alternative H, the selected alternative, proposes to maintain the current sagebrush canopy cove over the next ten years. We do not anticipate an increase in the number of wildfires. We agree that wildland fires in grassy fuels are more easily controlled than fires in sagebrush, and that we do not want destructive fires. All wildland fires on the Grassland will be aggressively suppresse under all alternatives and in all fuel types. However, wildland fires will never be completely eliminated from the Grassland regardless of how it is managed.

Category **Wildlife**

Letter Number *37 - Curlew DEIS* Comment ID 298

Comment: Yet, with the tough times, I do remember there were always plenty of sage grouse and sharp-tail grouse available. I remember this because we ate these birds quite often throughout the year. In the summer time, the birds would be found in the farm fields. During the winter they would move up in the foot hills and use the small short sagebrush on the ridges.

Response: The Final EIS contains updated and additional information on sage grouse population trends. Appendix I contains a comprehensive review of all information available at the time of this analysis. Some of this information has also been included in Chapter 3 in the Wildlife Habitat Section. The Biological Evaluation in Appendix J evaluates the effects of management proposals in Alternative H, the selected alternative in the Record of Decision, on all appropriate Grassland wildlife species, including fish.

Letter Number *37 - Curlew DEIS* Comment ID 301

Comment: Sage grouse do not thrive on thick tall sagebrush. Keeping the valley in a natural grass condition and sagebrush on the hills is more natural for the sage and sharp-tailed grouse. These are the conditions from which they developed through evolution.

Response: Sage grouse habitat requirements have been studied and well documented across the western states over the last several decades. These studies have overwhelmingly concluded that sage grouse use sagebrush with canopy cover of 15-25%, with understories of perennial grasses an forbs as breeding habitats. In addition, sage grouse use sagebrush stands with canopy cover 10 30% and heights of 25-35 cm as winter habitat.

Alternative H, the selected alternative in the Record of Decision, maintains the existing sagebrush canopy cover on the Grassland for the ten-year Plan period using a combination of light and heavy herbicide applications or mechanical methods. Vegetation treatments are prioritized in areas of the Grassland where sagebrush canopy cover is greater than 25 percent.

Letter Number *37 - Curlew DEIS* Comment ID 304

Comment: Sage grouse is considered an upland game bird as found in the Fish and Game hunting regulations. If it follows even remotely the same pattern as the Sharp-tailed grouse, it would be many years before a determination would be made if the sage grouse is an endangered species. If the sage grouse in time becomes an endangered species, the grassland plan as I understand could be amended to show changes if needed. It doesn't make sense to change things completely and plan things around the sage grouse when it is considered a game bird and the population is as good or better than I remember for many, many years.

Response: The FEIS includes additional information on sage grouse population trends. Appendix I includes a comprehensive review of all information available at the time of this analysis. Some of this infomration has also been incorporated into Chapter 3, Wildlife Habitat Management.

You are correct in that the Grassland Plan can be amended if new information shows that management activities are causing a trend toward the listing of any species. Existing studies suggest that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

Category **Alternative G**

Letter Number *38 - Curlew DEIS* Comment ID 145

Comment: The proposal to fence the riparian areas will make livestock movement more difficult. These fences are very costly and difficult to maintain. The money that would be spent for these fences would be much better utilized in the areas of vegetative treatment and development of water for livestock and wildlife use… in short, it would be a major mistake to fence riparian areas on the Curlew NG.

Response: The majority of the stream channels and associated riparian areas within the Grassland are functioning-at-risk to non-functioning (See the Riparian/Wetland section of Chapter 3 in the EIS) .

Alternative H, the selected alternative in the Record of Decision, reduces corridor fencing to about five miles on streams that have been assessed as being "at risk" from properly functioning condition to accelerate recovery to PFC status. We believe these are the streams that will benefit most from this kind of management activity. In addition, all other perennial streams, not currently fenced into riparian pastures, would be fenced using existing fences where practical. While the construction and maintenance of fence can be costly, these strategies should be effective in protecting and restoring the valuable riparian and aquatic resources within the Grassland.

Letter Number *38 - Curlew DEIS* Comment ID 143

Comment: The proposed management alternative will convert 71% of other area to old growth sagebrush. This will result in a significant loss of grass and forb species, and will reduce livestock carrying capacity. Old growth sagebrush produces very little forage for livestock and is useless for most species of wildlife. This would be a devastating blow to the livestock industry in Oneida County.

Response: The sage grouse Guidelines (Connelly et al 2000) are the most recent, peer-reviewed set of recommendations for management of sage grouse habitat. These guidelines emphasize the importance of sagebrush stands in 15-25% canopy cover for nesting habitat, and 10-30% canop cover for winter habitat.

Currently about 59% of the sagebrush is in the canopy cover >15% category. Two alternatives would result in a decrease; five alternatives would result in an increase and one alternative woul remain about the same.

The selected alternative, Alternative H, would treat a total of 12,100 acres, primarily with herbicide applications, to maintain the existing canopy cover on the Grassland over the next ten-year planning period.

Category **Comment Noted**

Letter Number *38 - Curlew DEIS* Comment ID 142

Comment: Since leaving Malad, I have visited the Grasslands on many occasions. I visited the area in the early winter of 1999, and was impressed with the overall health of the area. I feel the land managers have done a good job improving this area for wildlife and livestock.

Response: Thank you for your comment. The effects of current management have been disclosed in the EIS as the "Affected Environment".

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe, Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses with wildlife needs.

Category **Vegetation**

Letter Number *38 - Curlew DEIS* Comment ID 144

Comment: It has been demonstrated over many years of study, research and practical on-the-ground knowledge that 1,000 to 2,000 acres of sagebrush needs to be treated annually to preserve optimal health of both livestock and wildlife species. The vegetative treatments that rotate sagebrush areas over a thirty year cycle will result in the most productive and beneficial conditio for the entire ecosystem.

Response: Alternative A in the DEIS provides this option; however, the Forest Service has selected Alternative H to meet other resource needs.

Category **Alternatives**

Letter Number *39 - Curlew DEIS* Comment ID 240

Comment: I don't feel a good alternative has been proposed. Alternative A is by far the best but it should not allow for treatments to eliminate the areas heavily infested by bulbous bluegrass. This provision of Alternative B should be incorporated into alternative A for the best utilization of the resources for wildlife and grazing.

In addition sagebrush communities should be pushed towards PFC over the term of the management plan. Also more riparian pastures may be a consideration but it would be a real mistake to make riparian exclusion zones.

Response: Based on public comments on the DEIS, the ID Team developed Alternative H, the selected alternative. This alternative would maintain the current percent of acres in each sagebrush canopy over class over the 10-year plan period through a variety of vegetation treatments. Approximately 2,500 acres, where bulbous bluegrass is predominant in the understory, would be treated using prescribed fire, plowing and re-seeding or some other method that would achieve restoration of the herbaceous understory to a more desirable condition. Because of the 5 to 6 year treatment process and the extensive disturbance factor to treat bulbous bluegrass, a 2,500 acres constraint of The remaining 9,600 acres proposed for treatment would be treated to reatin the current number of acres in each of the sagebrush canopy cover classes using herbicide applications. While this alternative would not meet PFC criteria at the end of the 10-year planning period, treatments would maintain existing sagebrush canopy cover and would trend vegetation structure, composition and patterns toward PFC over the long-term. Through adaptive management strategies and focused monitoring activities, we should be better able to understand the effects of management activities and uses on the resources.

In addition, upland utilization levels would be established at 50 percent grassland-wide with further refinement in Allotment Management Plan updates. Corridor fencing would be reduced and applied only on "at risk" streams (approximately 5 miles) that would benefit from fencing. The remaining perennial streams would be fenced into riparian pastures using existing fences where feasible. Riparian livestock utilization would be determined based on the properly functioning condition of the stream. Those streams that are non-functioning would be grazed using light utilization standards, while those streams in properly functioning condition would be grazed at a level that maintains properly functioning condition.

The range of alternatives was developed to respond to the issues raised from public scoping. The present range is adequate for the significant issues identified during public involvement.

Category **Comment Noted**

Letter Number *39 - Curlew DEIS* Comment ID 245

Comment: There is ample evidence that the Curlew National Grasslands are in much better condition than they were 40 or 50 years ago and we must be allowed to continue the improvement in a proven manner.

Response: Thank you for your comment. We agree and have displayed in the EIS that natural resources were drastically altered prior to acquisition of this area by the government. Overall longterm trends have been upward. These resource conditions are based on the current and past management and are depicted in the Affected Environment of the EIS.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs.

Category **Economics**

Letter Number *39 - Curlew DEIS* Comment ID 244

Comment: The economic analysis in the Draft EIS only considers changes due to losses or gains of jobs not the loss due to decreased livestock production and the resulting loss of livestock sales. As is well-known the ripple or multiplier effect of income in a community is very substantial so the loss of this income would also be very substantial.

Response: An expanded economic anaysis was conducted for the FEIS and in the Chapter 4, Economics effects section. The analysis includes estimates of direct, indirect, and induced multplier effects of changes in grazing levels on the CNG.

Category **Laws & Regulations**

Letter Number *39 - Curlew DEIS* Comment ID 241

Comment: In my opinion far too much emphasis has been placed on sage grouse at the expense of other legitimate uses of the CNG. It is my understanding that there is a Secretary's Administration Order of August 1963 which states: "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use, and to promote development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas of which the National Grasslands are part."

Response: Title 3, Section 31 of the Bankhead Jones Farm Tenant Act states, "The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impariment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare, but not to build industrial parks or establish private or commercial enterprises."

Titles I, II and IV were repealed by Congress by the Agricultural Act of 1961. P.L.. 87-128. Title III, though not repealed, has been amended several times since 1937. In the 1960's, the Secretary of Agriculture issued three administrative orders involving the National Grasslands. The 1963 Order was perhaps the most significant since this order amended the management direction in the preceeding two orders. Section 213.1 of the 1963 Order in part states, "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use and to promote the development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas where the National Grasslands are a part."

The most significant Act affecting the National Grasslands, since the passage of the Bankhead-Jones Farm Tenant Act of 1937, was the enactment of the National Forest Management Act (NFMA) in 1976. Among other things, the Act requires the preparation of management plans for all units of the National Forest System of which National Grasslands are a part. In the early days the focus of National grasslands was on the value of stabilized watersheds, the productive use of forage by livestock and the relationships of both to rural community stability. Since then, many other values have been added - oil, gas, uranium, and coal; open space vistas; cultural resources; recreation opportunities; wildlife habitat; enjoyment of native plants; threatened and endangered plant and animal species; outdoor laboratories; and solitude.

While the Preamble of the Act states that the primary purpose is to "secure occupancy of farms and farm homes," it is not an operative part of the Statute and does not preempt the direction found in the body of the legislation. Furthermore, the Curlew NG is assisting in securing occupancy of farms by providing low-cost forage for the members of the Curlew and Buist Grazing Associations.

All of the alternatives meet the intent of the BJFTA, especially if we consider the remarks of Congressman Jones, chief sponsor of the Act for the House. He noted that "these lands may be used for any public purpose such as parks, game preserves, recreational centers, forest reserves, or for any other public purpose." Thus, even Alternative D, which eliminates livestock grazing on the CNG, would meet the intent of the BJFTA.

Category **Wildlife**

Letter Number *39 - Curlew DEIS* Comment ID 242

Comment: I don't understand how Alternative G meets the Sage Grouse Plan as stated on summary, page 20. All the new fence construction would not meet plan guidelines nor would the maintenance of 21 miles of tree rows meet the spirit of the Sage Grouse Plan.

Response: Effects of fences on sage grouse are discussed on page 4-30 of the EIS. Alternative H, the selected alternative in the Record of Decision, reduces the miles of riparian corridor fencing to about five miles on streams that are currently assessed as being "at risk." Fencing these stream reaches will accelerate the recovery of these areas toward a properly functioning condition. All other riparian areas that are not currently in riparian pastures would be fenced into riparian pastures using existing fences where practical. The guideline for the construction of new fence (General Habitat no. 3 in Connelly, et al, 2000) has been incorporated into the Grassland Plan and will be applied during site-specific project planning.

Effects of tree rows on sage grouse are discussed by alternative in Chapter 4 of the EIS. Alternative H, the selected alternative in the Record of Decision, does not propose any additional tree rows.

Letter Number *39 - Curlew DEIS* Comment ID 243

Comment: At the local working group meeting on March 22, 2001, we did reach consensus that the sage grouse population in the Greater Curlew Valley is at least stable for the last several years and most likely much larger than was estimated in 1997. Most of us felt the population was increasing at slight to moderate levels. I think it would be a grave mistake to radically alter the management from what has been done for the last 35 years since doing so may have an unintended detrimental effect on sage grouse populations.

Response: The Working Group did reach concensus that based on the previous three years of trend transect data, that populations appeared stable. However, harvest data from 2000, which wasn't available at that meeting, indicated low production in the spring of 2000. This low production may be related to drought and lowered forb production. This was reflected in the spring 2001 lek and trend transect data, which showed that numbers were down. IDFG believes that over the last 4 years, in the GCVA, sage grouse numbers have stabilized at levels lower than historical (D. Meints, IDFG Biologist, personal communication).

Under current law the Idaho Fish & Game Department is responsible for managing huntable wildlife populations while the Forest Service is responsible for maintaining adequate quantity and quality of habitat, in cooperation with State Fish & Game, to meet huntable population objectives. Historically, the Forest Service has relied on population numbers provided by State Fish and Game surveys and monitoring efforts. Population numbers are estimates and while these estimates may not reflect the actual numbers of birds, some reasonable predictions can be made on the viability of a given population.

In reviewing IDFG monitoring information on sage grouse lek attendance, data indicate that based on mean number of male sage grouse per lek, when looking at the long-term trend over 20-30 years, sage grouse populations are on a downward trend over the Greater Curlew Valley Area. Because the CNG comprises only 9% of the GCVA and is broken into 3 distinct units, it is difficult to look at population trends on just the CNG. FS District lek attendance data and field observations suggest that while the mean number of males per lek has declined, the overall number of leks has increased.

Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

Category **Alternative G**

Letter Number *4 - Curlew DEIS* Comment ID 119

Comment: Seems to me, if the permittees want to continue intensive grazing practices on the Curlew, they will need to take more and more responsibility for protective features and controls that allow suitable results in sensitive areas. Along riparian areas, near water troughs and ponds, or simpl where the level of grazing is immediately visible to traveling publics, the permittees need to fence to enhance the acceptable use of the land, not just for the effective movement of their cattle. Grazing practices are coming under increased scrutiny, not from the managers as much as from the anti-grazing critics. Ranchers had better respond themselves and not expect protection by the Forest Service, from outside influences. So the question of more riparian fencing is not one of who ends up with the responsibility for construction or maintenance, but rather whether fencing is necessary to continue grazing at all. And, if so, those who want to graze had better figure out the best way to do so and protect the riparian and other sensitive areas. I'd favor riparian pastures, and more intensive management of the livestock by permittees, but if the only way riparian areas can be protected is through fencing of the stream courses, then that's what should be done. To presume that means FS construction and maintenance of the fences unreasonable and unacceptable.

Response: While we acknowledge the permittees have invested time and money in improving livestock management on the Curlew NG by adding waterlines or moving water troughs (Morgan Evans, pers. comm. 9/17/01), the selected alternative corridor fences "at risk" streams (approximately 5 miles) that would benefit from fencing and move these streams toward a properly functioning condition. Other perennial streams would be fenced into riparian pastures using existing pasture fences where feasible. Riparian livestock utilization in riparian pastures would be based on the PFC of the stream. Those streams that are non-functioning or continuing to through a geological stabilization process would be grazed at a lower utilization rate than those streams that are in properly functioning condition that could be grazed at a higher utilization level as long as PFC was maintained.

Monitoring will determine if the proposed grazing strategies are effective in protecting and restoring the watershed, riparian and aquatic resources within the Grassland.

Category **Laws & Regulations**

Letter Number *4 - Curlew DEIS* Comment ID 118

Comment: Glancing through the document I don't get a clear picture of the distinction of the Curlew from other portions of the Caribou, or the nature of its origin… The Bankhead Jones Farm Tenant Act gave responsibility for management as a demonstration area and research opportunity to benefit surrounding lands, so others could learn and do likewise. The use of chemicals, fertilizers, mechanical treatments were all attempted to find a suitable means of maintaining production of forage for livestock, while providing wildlife habitat, recreation opportunities and soil/vegetative stability. That's not typically done elsewhere on the National Forest, and calls for more intensive management that other lands may warrant or benefit from - not as an end in itself, but for the benefit it may have in influencing the treatment and management of other similar lands.

Response: Title 3, Section 31 of the Bankhead Jones Farm Tenant Act states, "The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impariment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare, but not to build industrial parks or establish private or commercial enterprises."

Titles I, II and IV were repealed by Congress by the Agricultural Act of 1961. P.L.. 87-128. Title III, though not repealed, has been amended several times since 1937. In the 1960's, the Secretary of Agriculture issued three administrative orders involving the National Grasslands. The 1963 Order was perhaps the most significant since this order amended the management direction in the preceeding two orders. Section 213.1 of the 1963 Order in part states, "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use and to promote the development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas where the National Grasslands are a part."

The most significant Act affecting the National Grasslands, since the passage of the Bankhead-Jones Farm Tenant Act of 1937, was the enactment of the National Forest Management Act (NFMA) in 1976. Among other things, the Act requires the preparation of management plans for all units of the National Forest System of which National Grasslands are a part. In the early days the focus of National grasslands was on the value of stabilized watersheds, the productive use of forage by livestock and the relationships of both to rural community stability. Since then, many other values have been added - oil, gas, uranium, and coal; open space vistas; cultural resources; recreation opportunities; wildlife habitat; enjoyment of native plants; threatened and endangered plant and animal species; outdoor laboratories; and solitude.

While the Preamble of the Act states that the primary purpose is to "secure occupancy of farms and farm homes," it is not an operative part of the Statute and does not preempt the direction found in the body of the legislation. Furthermore, the Curlew NG is assisting in securing occupancy of farms by providing low-cost forage for the members of the Curlew and Buist Grazing Associations.

All of the alternatives meet the intent of the BJFTA, especially if we consider the remarks of Congressman Jones, chief sponsor of the Act for the House. He noted that "these lands may be used for any public purpose such as parks, game preserves, recreational centers, forest reserves, or for any other public purpose." Thus, even Alternative D, which eliminates livestock grazing on the CNG, would meet the intent of the BJFTA.

Category **Comment Noted**

Letter Number *40 - Curlew DEIS* Comment ID 285

Comment: The current management plan, Alternative A, has been in place for many years and the condition of the grasslands is better today because of those practices.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Letter Number *40 - Curlew DEIS* Comment ID 282

Comment: Alternative G in my opinion has been written by those who have an agenda of removing cattle from public lands and seems to me to be the primary goal of managing sage grouse.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

We regret that you feel there is significant bias in the EIS. The Interdisciplinary Team is made up of people from various disciplines with many years of professional knowledge and experience. To show our objectivity, we have only drawn conclusions where we have studies, data or site-specific information to substantiate them. Also, we have used many different sources for our information on vegetative conditions, wildlife population trends, etc. instead of relying on only one source. The FEIS contains additional information and current site specific analysis to further substantiate our effects analysis.

New issues and challenges, policy changes, and new state and federal laws and/or court cases compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Alternative H, the selected alternative in the Record of Decision, addresses your concern by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Category **Economics**

Letter Number *40 - Curlew DEIS* Comment ID 287

Comment: As a small rancher the economics of reducing cattle numbers will be devastating to the operation that has been in my family for many years. When that number is compounded in reductions across the board for the Curlew H&C Association the economics will effect a great number of people. Not only those who raise cattle but those who sell equipment, fuel, supplies, grocery stores, and everyone where commodities are purchased.

Response: The economic effects of any alternative are displayed at the Oneida County level in the FEIS, Chapter 4, Economics section. Effects on any one rancher, set of permittees, or grazing association are not possible to determine in this analysis. Our intent is certainly not to devastate any permittee but to estimate potential effects on grazing capacity Grassland-wide. These estimates are not certain reductions, and do not represebt a decision to reduce cattle numbers. Any actual changes in the livestock numbers to be permitted will be addressed through followup site-specific allotment management planning. Changes in allotment management direction, herd management, use of improvements, or other measures, may sufficiently achieve the resource objectives and restoration, without reductions.

Category **Laws & Regulations**

Letter Number *40 - Curlew DEIS* Comment ID 286

Comment: The requirements of the Bankhead Jones Farm Tenant Act of 1937 is more closely met by the practices that have been ongoing than any of the other alternatives offered by the draft EIS. Alternative G will in no way meet the objective of the Bankhead Jones Act. Alternative A will more closely sustain and promote the needs of wildlife and grazing cattle more than the other plans offered.

Response: Title 3, Section 31 of the Bankhead Jones Farm Tenant Act states, "The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impariment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare, but not to build industrial parks or establish private or commercial enterprises."

Titles I, II and IV were repealed by Congress by the Agricultural Act of 1961. P.L.. 87-128. Title III, though not repealed, has been amended several times since 1937. In the 1960's, the Secretary of Agriculture issued three administrative orders involving the National Grasslands. The 1963 Order was perhaps the most significant since this order amended the management direction in the preceeding two orders. Section 213.1 of the 1963 Order in part states, "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use and to promote the development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas where the National Grasslands are a part."

The most significant Act affecting the National Grasslands, since the passage of the Bankhead-Jones Farm Tenant Act of 1937, was the enactment of the National Forest Management Act (NFMA) in 1976. Among other things, the Act requires the preparation of management plans for all units of the National Forest System of which National Grasslands are a part. In the early days the focus of National grasslands was on the value of stabilized watersheds, the productive use of forage by livestock and the relationships of both to rural community stability. Since then, many other values have been added - oil, gas, uranium, and coal; open space vistas; cultural resources; recreation opportunities; wildlife habitat; enjoyment of native plants; threatened and endangered plant and animal species; outdoor laboratories; and solitude.

While the Preamble of the Act states that the primary purpose is to "secure occupancy of farms and farm homes," it is not an operative part of the Statute and does not preempt the direction found in the body of the legislation. Furthermore, the Curlew NG is assisting in securing occupancy of farms by providing low-cost forage for the members of the Curlew and Buist Grazing Associations.

All of the alternatives meet the intent of the BJFTA, especially if we consider the remarks of Congressman Jones, chief sponsor of the Act for the House. He noted that "these lands may be used for any public purpose such as parks, game preserves, recreational centers, forest reserves, or for any other public purpose." Thus, even Alternative D, which eliminates livestock grazing on the CNG, would meet the intent of the BJFTA.

Category **Livestock grazing**

Letter Number *40 - Curlew DEIS* Comment ID 284

Comment: The Curlew Valley Horse & Cattle Association have for many years tried very hard to help meet the needs of wildlife in our water development and the control of sage brush. There are more numbers of wildlife in those areas where grazing has been managed, sagebrush controlled than you'll ever find in those areas that have just let sagebrush grow prolifically.

Response: Sage grouse habitat requirements have been studied and well documented across the western states, over the last several decades. These studies have overwhelmingly concluded that sage grouse use sagebrush with canopy cover of 15-25%, with understories of perennial grasses an forbs as breeding habitats. In addition, sage grouse use sagebrush stands with canopy cover 10 30% and heights of 25-35 cm as winter habitat. More information and references are found in the Wildlife Habitat Management section of Chapter 3 of the EIS.

While water developments and sagebrush treatments can improve habitat for many wildlife species, it is not enough for some. Those species that are dependent on denser sagebrush stands such as Brewer's sparrow, sage sparrow, and sage grouse, do not always benefit direc from sagebrush "control".

Category **Revised Plan**

Letter Number *40 - Curlew DEIS* Comment ID 288

Comment: We as ranchers and farmers have a love of the land as has been demonstrated and will continue to do so by supporting multiple use and being good stewards of the land. A blanket policy that covers all riparian areas is not a good policy or sound management. There needs to be flexibility in some of these decisions that are made.

Response: The stated goals in the Grassland Plan are to minimize adverse effects to riparian and aquatic habitat and to maintain those areas considered to be in "good" condition and restore those areas determined to be in a deteriorated condition. Stubble height, woody species utilization and bank stability are indicators of stated goals and are not ends in themselves. That is, the goal is a healthy system, not a six-inch stubble height. These indicators, supported by literature, provide a starting point for managers. If, through monitoring, it is determined that these indicators are adequate in achieving the desired condition or conditions, then they will remain as standards. If it is determined that they are not adequate to obtain desired conditions, they may be changed, provided sufficient documentation is provided and appropriate administrative procedures are followed.

How livestock are managed to achieve the indicator 6-inch stubble height (and ultimately the goal of a healthy system) is up to the manager. It is not appropriate to specify management options or techniques used to achieve desired conditions at the Land Management Plan level. The method or methods used to achieve desired conditions is addressed in the Allotment Management Plan or Annual Operating Plan level on a field-by-field basis or even on a pasture-by-pasture basis. This could include any number of options including restricting numbers, imposing time limits, herding, salting and so forth, used separately or in combination.

Category **Wildlife**

Letter Number *40 - Curlew DEIS* Comment ID 283

Comment: In my observation and these are surely not scientific, we are seeing more sage grouse and short tail grouse in the last several years. These numbers are following cycles that I also see in other species of birds like the pheasant, Mountain blue bird and even the Magpie. I feel that those who work on the lands and have done long term studies were not given proper and fair recognition fo the work they have done, when they were contradictory to the figures that was on the agenda o some of the main line Forest service managers and people of the Idaho Fish and Game.

Response: Under current law the Idaho Fish & Game Department is responsible for managing huntable wildlife populations while the Forest Service is responsible for maintaining adequate quantity and quality of habitat, in cooperation with State Fish & Game, to meet huntable population objectives. Historically, the Forest Service has relied on population numbers provided by State Fish and Game surveys and monitoring efforts. Population numbers are estimates and while these estimates may not reflect the actual numbers of birds, some reasonable predictions can be made on the viability of a given population.

In reviewing IDFG monitoring information on sage grouse lek attendance, data indicate that based on mean number of male sage grouse per lek, when looking at the long-term trend over 20-30 years, sage grouse populations are on a downward trend over the Greater Curlew Valley Area. Because the CNG comprises only 9% of the GCVA and is broken into 3 distinct units, it is difficult to look at population trends on just the CNG. FS District lek attendance data and field observations suggest that while the mean number of males per lek has declined, the overall number of leks has increased.

Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

This final EIS includes additional information on sage grouse population trends. Please refer to Wildlife Habitat Management in Chapter 3, Appendix I and Appendix J.

Category **Alternative G**

Letter Number *41 - Curlew DEIS* Comment ID 291

Comment: Alternative G promotes a higher fire risk.

Response: All wildland fires on the Grassland will be aggressively suppressed under all alternatives. The potential for larger, more intense wildfires does increase as the amount of sagebrush with a dense canopy cover increases. The wildland fire hazard was one of the many factors considere in choosing among alternatives for managing the Grassland. However, wildland fires will never be completely eliminated from the Grassland, regardless of how it is managed.

Letter Number *41 - Curlew DEIS* Comment ID 293

Comment: Alternative G will have an adverse effect on the economic stability of Oneida County.

Response: The Economic and Social Values section of Chapter 4 describes the estimated effects on the Oneida County economy. This section has been updated and begins on page 4-39 of the final EIS.

Letter Number *41 - Curlew DEIS* Comment ID 294

Comment: Alternative G does not meet the requirements of the Bankhead Jones Farm Tenant Act.

Response: While the Preamble of the Act states that the primary purpose is to "secure occupancy of farms and farm homes," it is not an operative part of the Statute and does not preempt the direction found in the body of the legislation. Furthermore, the Curlew NG is assisting in securing occupancy of farms by providing low-cost forage for the members of the Curlew and Buist Grazing Associations.

All of the alternatives meet the intent of the BJFTA, especially if we consider the remarks of Congressman Jones, chief sponsor of the Act for the House. He noted that "these lands may be used for any public purpose such as parks, game preserves, recreational centers, forest reserves, or for any other public purpose." Thus, even Alternative D, which eliminates livestock grazing on the CNG, would meet the intent of the BJFTA.

Title 3, Section 31 of the Bankhead Jones Farm Tenant Act states, "The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impariment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare, but not to build industrial parks or establish private or commercial enterprises."

Titles I, II and IV were repealed by Congress by the Agricultural Act of 1961. P.L.. 87-128. Title III, though not repealed, has been amended several times since 1937. In the 1960's, the Secretary of Agriculture issued three administrative orders involving the National Grasslands. The 1963 Order was perhaps the most significant since this order amended the management direction in the preceeding two orders. Section 213.1 of the 1963 Order in part states, "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use and to promote the development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas where the National Grasslands are a part."

The most significant Act affecting the National Grasslands, since the passage of the Bankhead-Jones Farm Tenant Act of 1937, was the enactment of the National Forest Management Act (NFMA) in 1976. Among other things, the Act requires the preparation of management plans for all units of the National Forest System of which National Grasslands are a part. The implementation of NFMA has done more to focus public attention on the National Grasslands than any other single event. In the early days the focus of National grasslands was on the value of stabilized watersheds, the productive use of forage by livestock and the relationships of both to rural community stability. Since then, many other values have been added - oil, gas, uranium, and coal; open space vistas; cultural resources; recreation opportunities; wildlife habitat; enjoyment of native plants; threatened and endangered plant and animal species; outdoor laboratories; and solitude.

Category **Comment Noted**

Letter Number *41 - Curlew DEIS* Comment ID 295

Comment: Alternative G was prepared primarily by people who would like to remove the cattle from the CNG.

Response: Thank you for your comment. We regret that you feel there is significant bias in the EIS. The Interdisciplinary Team is made up of people from various disciplines with many years of professional knowledge and experience. To show our objectivity, we have only drawn conclusions where we have studies, data or site-specific information to substantiate them. Also we have used many different sources for our information on vegetative conditions, wildlife population trends, etc. instead of relying on only one source. The FEIS contains additional information and current site specific analysis to further substantiate our effects analysis.

In addition, the project record includes comments received from the public through public involvement activities during the planning process and how those comments were used to identify issues. The project record also links together how these public issues and concerns were used to develop the alternatives in the EIS.

Alternative H, the selected alternative in the Record of Decision, was developed as a result of public comments on the Draft EIS.

Letter Number *41 - Curlew DEIS* Comment ID 289

Comment: Alternative A has been in place for many years and has sustained a good sage grouse population as well as provided sufficient feed for livestock. The current management of the Curlew Grasslands addresses the needs of both the wildlife and the grasslands. It has produce a healthy environment for both wildlife and livestock.

Response: Thank you for your comment. All of the alternatives were analyzed in the DEIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Letter Number *41 - Curlew DEIS* Comment ID 292

Comment: Alternative G is primarily managing for sage grouse only.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. Generally the decision maker chooses the alternative which best meets the Purpose and Need. The Record of Decision will disclose and explain the reasoning behind his choice of alternatives.

Sage grouse habitat is one of the significant issues and according to NEPA, we must develop alternatives to address those issues. In addition, the NFMA requires that we maintain viability for wildlife species. Since sage grouse numbers west-wide are declining, the Forest must insure its management is not contributing to a loss of viability.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Letter Number *41 - Curlew DEIS* Comment ID 296

Comment: The current management plan (Alternative A) has promoted development of grassland agriculture and sustained yield management of the forage, wildlife, water, and recreation. I recommend that Alternative A be continued in the management of the CNG.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework that emphasizes focused monitoring.

Category **Wildlife**

Letter Number *41 - Curlew DEIS* Comment ID 290

Comment: Sage grouse counts from Forest Service reports and the Gardner Study show that the number o birds is at an all time high. There is no evidence showing that the current grazing standards are in any way hurting the growth of the sage grouse, if anything it shows that the sage grouse hav flourished throughout the years while the grasslands have been managed under the current plan (Alternative A).

Response: The final EIS contains updated and additional information on sage grouse population trends. Appendix I contains a comprehensive review of all information available at the time of this analysis. Some of this information has also been included in Chapter 3, Wildlife Habitat Management Section.

Alternative H, the selected alternative in the Record of Decision, proposes an adaptive framework and focused monitoring. For example, livestock grazing utilization levels may be lower in areas of the Grassland that are important for sage grouse nesting and brood-rearing an higher in areas where crested wheatgrass is the predominant understory species in order to maintain the plant's vigor over time. Grazing patterns would most likely rotate from year to year. Under this kind of management strategy a part, if not all, of the Grassland will provide adequate residual vegetation for nesting and brood-rearing sage grouse.

Category **Alternative G**

Letter Number *42 - Curlew DEIS* Comment ID 261

Comment: I feel that Alternative G will put more ranchers out of business and we will have brush land instead of Curlew Grass land. It is my hope that people will consider also the ranchers families and livelihood.

Response: The Economic and Social Values section of Chapter 4 describes the estimated effects on Grassland permittees and the Agricultural sector of the Oneida County economy. There are limitations to the degree that we can analyse effects on individual ranchers, families or their livelihoods. However, the Forest did consider the local economy, the ranching industry and the contribution of the Grassland to these important local needs. The Forest Service mission includes considering the effects of our management decisions on all those potentially affected by them.

The social and economic effects analysis in the FEIS has been updated and begins on page 4-39.

Category **Comment Noted**

Letter Number *42 - Curlew DEIS* Comment ID 260

Comment: I feel the current management plan, Alternative A, has worked very well for livestock and wildlife Alternative A meets requirements of Bankhead Jones Farm Tenant Act of 1937.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaaptive framework with focused monitoring.

Category **Alternative G**

Letter Number *43 - Curlew DEIS* Comment ID 218

Comment: If additional funding would become available from other sources…the maintenance necessary to keep these high pressure fences up would be quite expensive. Nothing is spelled out in the Plan as to who is to maintain these fences.

…additional fencing of riparian areas may produce some potential problems for sage grouse. The Idaho Sage Grouse Guidelines (IFG) recommends that fences not be constructed around leks and riparian areas because of hazards to sage grouse. The hazards are identified as providing additional perch sites for raptors and sage grouse may be injured or killed by flying into these fences.

Response: Effects of fences on sage grouse are discussed in Chapter 4 of the EIS under each of the alternative discussions. The Grassland Plan incorporates a guideline for the construction of new fence (General Habitat no. 3 in Connelly, et al, 2000) and will be applied during site-specific planning.

Partly in response to public comments on the Draft EIS, Alternative H was developed which reduces the amount of corridor fencing and uses existing fences where feasible.

Letter Number *43 - Curlew DEIS* Comment ID 217

Comment: Alternative G calls for an unrealistic increase in fencing of riparian areas. This appears to be the top goal and priority. However, an additional source of funding is not identified in the plan. Forest Service regulations require Conservation Practice funds (CP funds) be completely spent every year. The CP funds are already committed to complete the North Carter project until 2003…without additional funding, Alternative G would be impossible to implement within the ten-year time frame.

Response: About 50% of the required fences are already in place. Funding for the remaining 50% could come from funds other than CP. Identification of the specific type of funding to accomplish future projects or management actions is outside the scope of this analysis. When an alternative is selected for implementation, specific funding codes for specific projects (such as fencing) will be determined at that time.

Partly in response to similar concerns, Alternative H was developed to reduce fencing and still provide for riparian improvement.

Category **Alternatives**

Letter Number *43 - Curlew DEIS* Comment ID 213

Comment: The document is extremely misleading when it refers to Alternative B as the proposed action. Only hidden at the end of the explanation of alternatives does it refer to Alternative G as the preferred alternative. It is also more than ironic and highly questionable that the "preferred" alternative was submitted to the Forest Service by the Idaho Wildlife Federation.

It appears to us that this method of selecting and exhibiting the preferred alternative is contrary to the NEPA process. This could prove to be a fatal flow to the draft DEIS if Alternative G continues as the preferred alternative.

Response: We apologize for the confusion. The Identification of the Preferred Alternative is listed in the Table of Contents. According to NEPA procedures, the Agency develops a Proposed Action and then forms alternatives to that Action to address significant issues. From the array of alternatives, the Agency then identifies its Preferred Alternative which may or may not be the Proposed Action (FSH 1909.15, 22.3). Although not in direct relation to this problem, the comment period for the Curlew Plan DEIS was extended for 60 days.

To clarify, the Idaho Wildlife Federation did not submit Alternative G to the Forest; however, had they, it could still be reasonable for the Forest to choose it as the Preferred Alternative. We are unclear why the commentor asserts that our "method of selecting and exhibiting the preferred alternative" may be "contrary to the NEPA process." If Alternative G becomes the chosen alternative, the rationale for that choice will be clearly disclosed in the Record of Decision.

Based on public comments on the DEIS, the ID Team developed Alternative H, the selected alternative. This alternative would maintain the current percent of acres in each sagebrush canopy over class over the 10-year plan period through a variety of vegetation treatments. Approximately 2,500 acres, where bulbous bluegrass is predominant in the understory, would be treated using prescribed fire, plowing and re-seeding or some other method that would achieve restoration of the herbaceous understory to a more desirable condition. Because of the 5 to 6 year treatment process and the extensive disturbance factor to treat bulbous bluegrass, a 2,500 acres constraint of The remaining 9,600 acres proposed for treatment would be treated to reatin the current number of acres in each of the sagebrush canopy cover classes using herbicide applications. While this alternative would not meet PFC criteria at the end of the 10-year planning period, treatments would maintain existing sagebrush canopy cover and would trend vegetation structure, composition and patterns toward PFC over the long-term. Through adaptive management strategies and focused monitoring activities, we should be better able to understand the effects of management activities and uses on the resources.

In addition, upland utilization levels would be established at 50 percent grassland-wide with further refinement in Allotment Management Plan updates. Corridor fencing would be reduced and applied only on "at risk" streams (approximately 5 miles) that would benefit from fencing. The remaining perennial streams would be fenced into riparian pastures using existing fences where feasible. Riparian livestock utilization would be determined based on the properly functioning condition of the stream. Those streams that are non-functioning would be grazed using light utilization standards, while those streams in properly functioning condition would be grazed at a level that maintains properly functioning condition.

Category **Comment Noted**

Letter Number *43 - Curlew DEIS* Comment ID 210

Comment: After thorough review and research of the draft plan, we feel compelled to explain strong dissatisfaction with this document and request that the proposed management changes be immediately withdrawn. We have found numerous discrepancies and realize that this is a thinly veiled attempt to manage for sage grouse habitat rather than a plan to manage the land to the intent for which the Curlew NG was created. In its overzealous effort to "protect" sage grouse, this draft EIS overlooks the current management of the land and fails to recognize that the system in place now both enables the presence of sage grouse on the land and allows for the use of the renewable resources.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. Sage grouse habitat is one of the significant issues and according to NEPA, we must develop alternatives to address those issues. In addition, the NFMA requires that we maintain viability for wildlife species. Since sage grouse numbers west-wide are declining, the Forest must insure its management is not contributing to a loss of viability.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Generally the decision maker chooses the alternative which best meets the Purpose and Need an dresolves public issues, which in this Plan, includes managing for multiple use. The Record of Decision discloses and explains the reasoning behind his choice of alternatives and how the chosen alternative provides for multiple uses.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Letter Number *43 - Curlew DEIS* Comment ID 212

Comment: It is the recommendation of ICA and the Curlew Cattle and Horse Association that the Forest Service implements Alternative A. As the saying goes, "if it's not broke, don't fix it." The current management structure that is in place is working.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Category **Economics**

Letter Number *43 - Curlew DEIS* Comment ID 216

Comment: The Draft EIS, for the most part, overlooks the economic and social factors while focusing almost solely on the ecological factors. It is the social and economic factors that have actually preserved the character of the CNG and maintained their health.

In the Draft's discussion of revenue losses, the loss of revenue from less livestock present in Oneida County is not considered. The document merely discusses loss of jobs due to the loss of head months listed. For this reason, the draft's estimation of total losses to the county falls short. On page 4-39, the comparison from the Beaverhead-Deerlodge National Forest is inadequate and not an accurate indicator for the potential affects to Oneida County.

Alternative G has proposed reductions in numbers of grazing cattle from 6.3% to 34.2% on the CNG. This reduction in cow numbers negatively impacts Oneida County with a revenue loss of $108,879 to $592,666 per year.

Response: The economic and social factors were not overlooked in the EIS. These factors are discussed in detail in Chapter 3, Section 3, Human Uses and Values, Economic and Social Values. These factors were considered in conjunction with other multiple use and ecological values and objectives in developing the alternatives, and in selecting the final alternative in the Record of Decision.

The economic and social analyses were strengthened in the FEIS to address comments such as these. A more complete Economic Impact Analysis was conducted using IMPLAN model. The use of Beaverhead NF data was eliminated and an analysis using Oneida County data was developed.

The degree of change in income and employment in Oneida County, by alternative, is displayed in Chapter 4, Economics section of the FEIS. The Analysis process can be reviewed in Appendix B of the FEIS.

Category **Fire**

Letter Number *43 - Curlew DEIS* Comment ID 219

Comment: In the past many of the fires on the CNG were controlled in grass and light sage areas with farm equipment (I.e. tractors and discs). From experience, when sagebrush cover becomes dense, it burns too hot for farm equipment to control, and small fires develop into large fires. All large fires in the Curlew Valley have occurred in heavy sagebrush areas. Alternative G compounds the problem of promoting more old mature sagebrush…with the increase of sagebrush canopy cover, the increase in fire intensity will also increase and put ranches, private landowners, the town of Holbrook, agricultural crops, and wildlife at great risk due to the fuel buildup. This is in direct conflict with the National Fire Plan.

Response: We agree that wildland fires in grassy fuels are more easily controlled than fires in sagebrush. All wildland fires on the Grassland will be aggressively suppressed in all alternatives and in all fuel types. However, wildland fires will never be completely eliminated from the Grassland regardless of how it is managed.

The analysis in the FEIS acknowledged the intermixed land ownership patterns on the Grassland. Thus, the Grassland was considered as a wildland urban interface area, and the FEIS is in compliance with the National Fire Plan. The wildland fire hazard was one of the many factors considered in choosing among alternatives for managing the Grassland.

The selected alternative (Alternative H) will maintain the existing sagebrush canopy cover classes over the ten-year plan period. Alternative H will result in fewer acres in the heavier canopy cover classes than Alternative G.

Category **Laws & Regulations**

Letter Number *43 - Curlew DEIS* Comment ID 211

Comment: The Bankhead Jones Farm Tenant Act of 1937 was enacted to address the problem. This act authorized the Federal Government to purchase and otherwise acquire sub-marginal farmlands. Section 32 of the bill states: "the Secretary of Agriculture is authorized to protect, improve, develop and administer any property so acquired and to construct such structures there on as may be necessary to adapt it to its most beneficial use." In June 1960 the Secretary's Administrative Order provided that the USFS administer lands under Title II of the Bankhead-Jones Act. The administrative order declared that the National Grasslands shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes. The Chief of th Forest Service was also directed to develop and administer the renewable resources of the National grasslands to the fullest extent obtained there from. The resources are to be managed so as to maintain and improve soil and vegetative cover and to promote the development of grassland agriculture in the area of which the National Grasslands are a part. Secretary's Administration Order of August 1963 states: "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use, and to promote development of grassland agriculture and sustained yield management of the forage, fish and wildlife, timber, water, and recreational resources in the areas of which the National Grasslands are a part."

Response: Title 3, Section 31 of the Bankhead Jones Farm Tenant Act states, "The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impariment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare, but not to build industrial parks or establish private or commercial enterprises."

Titles I, II and IV were repealed by Congress by the Agricultural Act of 1961. P.L.. 87-128. Title III, though not repealed, has been amended several times since 1937. In the 1960's, the Secretary of Agriculture issued three administrative orders involving the National Grasslands. The 1963 Order was perhaps the most significant since this order amended the management direction in the preceeding two orders. Section 213.1 of the 1963 Order in part states, "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use and to promote the development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas where the National Grasslands are a part."

The most significant Act affecting the National Grasslands, since the passage of the Bankhead-Jones Farm Tenant Act of 1937, was the enactment of the National Forest Management Act (NFMA) in 1976. Among other things, the Act requires the preparation of management plans for all units of the National Forest System of which National Grasslands are a part. In the early days the focus of National Grasslands was on the value of stabilized watersheds, the productive use of forage by livestock and the relationships of both to rural community stability. Since then, many other values have been added - oil, gas, uranium, and coal; open space vistas; cultural resources; recreation opportunities; wildlife habitat; enjoyment of native plants; threatened and endangered plant and animal species; outdoor laboratories; and solitude.

All of the alternatives meed the intent of the BJFTA, especially if we consider the remarks of Congressman Jones, chief sponsor of the Act for the House. He noted that "these lands may be used for any public purpose, such as parks, game preserves, recreational centers, forest reserves, or for any other public purpose." Thus, even Alternative D, which eliminates livestock grazing on the CNG would meet the intent of the BJFTA.

Category **Livestock grazing**

Letter Number *43 - Curlew DEIS* Comment ID 222

Comment: Rather than apply a standard of 6 inch stubble height, and thereby limit managers' abilities to make site-specific decisions, we feel it is more appropriate to make site-specific decisions. For riparian areas in PFC or functioning at risk and show upward trends, lower stubble heights would be acceptable. If the riparian areas are At Risk and showing a downward trend it may then be appropriate to adjust stubble height standards...

Simply applying stubble height standards regardless of how conservative, will not guarantee achievement of objectives. Trend analysis must be used for riparian and uplands alike to make management decisions…

Using stubble height as a grazing threshold has limited application. Length of stay, timing of grazing is more important to vegetative health and streambank stability than remaining stubble height.

Response: We agree that a simple stubble height parameter may not adequately address all situations and/or riparian/stream channel goals and objectives. For this reason, bank disturbance standards and woody species standards are also included (See Grassland Plan). The stated goals in the Grassland Plan are to minimize adverse effects to riparian and aquatic habitat and to maintain those areas considered to be in "good" condition and restore those areas determined to be in a deteriorated condition.

Stubble height, woody species utilization and bank stability are indicators of stated goals and are not ends in themselves. That is, the goal is a healthy system, not a six-inch stubble height. These indicators, supported by literature, provide a starting point for managers. If, through monitoring, it is determined that these indicators are adequate in achieving the desired condition or conditions, then they will remain as standards. If it is determined that they are not adequate to obtain desired conditions, they may be changed, provided sufficient documentation is provided and appropriate administrative procedures are followed.

There are numerous management options that can be implemented to achieve the desired conditions of the stream channels, riparian areas and wetlands. Time-in-pasture, rotation systems, herding, salting, as well as fencing are just a few of these options. These can be evaluated and addressed at the Allotment Management Plan and Annual Operating Plan levels. It is not appropriate at the Land Management Plan scale to specify what management techniques must be used at the Allotment scale to achieve desired conditions. This must be determined on an allotment-by-allotment or even pasture-by-pasture basis. Again, a healthy, functional RWA is the goal, not a specific stubble height or bank disturbance standard.

Letter Number *43 - Curlew DEIS* Comment ID 221

Comment: We protest the establishment of 6-inch minimum stubble heights across the board. Establishment of standards in this manner will greatly reduce the ability of managers to make site-specific decisions and stifle the flexibility needed to try new management techniques…..there is little scientific support for establishment of stubble heights in this manner.

Response: We agree that a simple stubble height parameter may not adequately address all situations and/or riparian/stream channel goals and objectives. The stated goals in the Plan are to minimize adverse effects to riparian and aquatic habitat and to maintain those areas considered to be in "good" condition and restore those areas determined to be in a deteriorated condition (See Grassland Plan).

Stubble height, woody species utilization and bank stability are indicators of stated goals and are not ends in themselves. That is, the goal is a healthy system, not a six-inch stubble height. These indicators, supported by literature, provide a starting point for managers. If, through monitoring, it is determined that these indicators are adequate in achieving the desired condition or conditions, then they will remain as standards. If it is determined that they are not adequate to obtain desired conditions, they may be changed, provided sufficient documentation is provided and appropriate administrative procedures are followed.

Category **Watershed**

Letter Number *43 - Curlew DEIS* Comment ID 220

Comment: The influence of the CNG management activities has little effect on the total watershed in the Curlew Valley. Much of the CNG watershed area is bordered by privately-owned farmland, resulting in a lack of protection from existing watersheds on the grassland. Upstream erosion plays a major part in the degradation of the CNG riparian and wet zones. Potential for active willow growth on the CNG riparian areas is not known, either through historical nor current riparian vegetation condition studies. To contend that grazing has depleted willow growth may not be a scientifically sound basis for the use of Alternative G in place of the Status Quo, Alternative A. No rare, sensitive, threatened or endangered aquatic or fish species are known to exist anywhere on the CNG. Stream flows are small, averaging less than 0.5 cubic feet per second. The potential for aquatic species and habitat is limited.

Response: It is correctly stated that the influence of the CNG on the overall watersheds within the entire Curlew Valley area is small. There are no known rare, sensitive, threatened or endangered aquatic or fish species within the Grassland. However, the Forest has an obligation to protect the public's resources, which includes aquatic and riparian systems, no matter how minor of a role they may play within a larger system. Further, the Forest is required to comply with State and Federal rules and regulations, which includes water quality standards. One way in ensuring water quality standards are met is to maintain healthy riparian areas and stable stream channels. Willows are one component of a healthy riparian system, but are not required in all situations and conditions. The presence of other deep-rooted vegetation, such as sedges, may be all that is needed to maintain a healthy system. An objective in the Grassland Plan includes the development of a strategy and action plan to restore degraded riparian systems within the Grassland. The applicability of willows, or any other vegetation, on any specific stream reach will be evaluated at that time.

Category **Wildlife**

Letter Number *43 - Curlew DEIS* Comment ID 215

Comment: The bag limit and number of days in the hunt have varied since the 1967 season of five days and a two-bird limit. For example, the 1990 through the 1995 seasons were 30 days long with a three bird limit. Because of the variation in length of season and bag limit, it is hard to compare year-to-year harvest data. To remove some of the variability from the data, the sage grouse harvest numbers were divided by the daily bag limit. Because most of the harvest occurs on the first day of the season this produced a common denominator for a long-term comparison of harvest numbers. In 1966 the sage grouse harvest/bag limit was 17,400 birds and in 1998 the sage grouse/bag limit was 17,500 birds. Another way to look at the data are to divide the birds per day by the bag limit for the season. In 1966, 0.6 birds/day per bag limit were taken which is identical to the 1999 season.

Response: While hunting regulations are outside the scope of this analysis, the final EIS includes updated information on sage grouse population trends. Appendix I contains a comprehensive review of all available information at the time of this analysis. Also refer to the Biological Evaluation and Biological Assessment in Appendix J.

Under current law the Idaho Fish & Game Department is responsible for managing huntable wildlife populations while the Forest Service is responsible for maintaining adequate quantity and quality of habitat, in cooperation with State Fish & Game, to meet huntable population objectives. Historically, the Forest Service has relied on population numbers provided by State Fish and Game surveys and monitoring efforts. Population numbers are estimates and while these estimates may not reflect the actual numbers of birds, some reasonable predictions can be made on the trends of a given population.

This issue will be analyzed further in the Final EIS.

Letter Number *43 - Curlew DEIS* Comment ID 214

Comment: The document states that sage grouse in the West have been declining, however it displays no evidence that sage grouse on the Curlew are declining. Actually, the opposite has occurred; sage grouse appear to be surviving at sustainable levels under the current management of the CNG.

Response: Under current law the Idaho Fish & Game Department is responsible for managing huntable wildlife populations while the Forest Service is responsible for maintaining adequate quantity and quality of habitat, in cooperation with State Fish & Game, to meet huntable population objectives. Historically, the Forest Service has relied on population numbers provided by State Fish and Game surveys and monitoring efforts. Population numbers are estimates and while these estimates may not reflect the actual numbers of birds, some reasonable predictions can be made on the viability of a given population.

In reviewing IDFG monitoring information on sage grouse lek attendance, data indicate that based on mean number of male sage grouse per lek, when looking at the long-term trend over 20-30 years, sage grouse populations are on a downward trend over the Greater Curlew Valley Area. Because the CNG comprises only 9% of the GCVA and is broken into 3 distinct units, it is difficult to look at population trends on just the CNG. FS District lek attendance data and field observations suggest that while the mean number of males per lek has declined, the overall number of leks has increased.

Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

The Final EIS includes additional information on sage grouse population trends. Please refer to Wildlife Habitat Management in Chapter 3, Appendix I and Appendix J.

Category **Comment Noted**

Letter Number *44 - Curlew DEIS* Comment ID 151

Comment: Curlew riparian standards for grazing are tighter than the SW Ecogroup's standards (30% vs. 45%). They also only have a 4-inch stubble height on mesic species such as Kentucky bluegrass.

Response: The riparian standards in the EIS vary by alternative. These standards were based on riparian conditions and needs for change specific to the Curlew National Grassland. It is not appropriate to compare the CNG standards to the SW Idaho area where issues and conditions may be very different. The levels proposed in the EIS are based on current science and the need to improve vegetative conditions on the CNG.

Letter Number *44 - Curlew DEIS* Comment ID 152

Comment: Southwest Idaho Ecogroup wants to know how we came up with a minimum patch size of 320 acres for sagebrush. They are using 40 acres in nesting habitat for sage grouse.

Response: As described in theDraft EIS, research by Paige and Ritter recommended using a 320-acre minimum patch size. This issue is further addressed in the Final EIS in the Wildlife Habitat Management Section of Chapters 3 and 4.

Category **Vegetation**

Letter Number *44 - Curlew DEIS* Comment ID 150

Comment: Plan does not call for using 2-4D herbicide. Why are we using herbicides?

Response: In some of the Alternatives, herbicides are one of the tools which would be available for managers to use. The primary herbicide considered is tebuthiron, a sagebrush-specific herbicide used to thin stands of sagebrush. Any proposal using herbicides would be subject to additional, site-specific analysis.

Category **Vegetation**

Letter Number *45 - Curlew DEIS* Comment ID 248

Comment: I challenge that the percent canopy cover sagebrush has been documented accurately on the CNG. I have walked several areas that were suppose to have high sagebrush canopies and found that rubber rabbit brush and threetip sagebrush was higher in canopy than big sagebrush. A better more accurate method that shows the different types of shrubs and their canopies should be used.

Response: Methods used to determine sagebrush canopy cover percent are discussed in Chapters 3 and 4 of the EIS. Canopy cover was assessed at two different scales using different data. At the broa scale, Gardner's (1997) data and information from the Draft Curlew National Grassland and Surrounding area Properly Functioning Condition Assessment were used. At the Grassland scale, Prevedel's (1997) GIS data and information from Collins and Harper, (1982) were used. Other than transects taken locally by Forest Service personnel, no other data was available to assess sagebrush canopy cover.

Site-specific analysis for vegetation treatments will consider structure, composition and distribution at a finer scale. This should provide a more accurate evaluation of existing conditions, along with other factors or issues on site-specific projects. A separate public involvement process will be conducted during project planning where you comments will be most useful.

Letter Number *45 - Curlew DEIS* Comment ID 247

Comment: I have observed a lot of mechanical damage to sagebrush plants on the CNG. In Apa 1998 it shows that sage grouse on the CNG preferred taller sagebrush with a larger crown area than surrounding sagebrush to nest under. It is my observation that sagebrush plants that fit Apa 1998 description for nest plants for sage grouse are being damaged by cattle and motorized vehicles to the extent they do not and will not be able to become desirable nest plants for sage grouse. Grazing should be reduced so that cattle don't do mechanical damage to sagebrush. Motorized vehicle traffic should be limited to roads and trails to reduce mechanical damage.

Response: Alternative H, the selected alternative, proposes to maintain the existing sagebrush canopy cover over the next decade through a combination of light and heavy herbicide applications and mechanical treatments. Treatments will focus on areas that currently have sagebrush in the greater than 25 percent canopy cover class. In addition, lek buffers will maintain sagebrush within 1/4 mile of active leks.

Sagebrush structure and shape is a function of many things including the species and its age (David L. Tart,1996; Neil E. West, 1999). Many of the sagebrush plants on the Grassland are getting old (greater than 50 years) and are undergoing natural dying processes, making them subject to mechanical damage. Some of the plants, it appears, never had a form that was conducive to sage grouse nesting. Individual bushes seem to vary in form by species and location within the Grassland. We have looked at the form of individual bushes and acknowledge some mechanical damage. However, there are other unknown factors that cannot be explained by the grazing level. Several discussions on sagebrush form have occurred with no conclusions.

Alternatives C, D, E, F, G, and H all require motorized vehicles to remain on designated roads.

Letter Number *45 - Curlew DEIS* Comment ID 246

Comment: The Forest Service should discontinue the bulbous bluegrass treatments because they fail to eliminate bulbous bluegrass. Grazing should be reduced to allow recovery of bunchgrasses that are already present on bulbous bluegrass, sagebrush areas. Sagebrush should be seeded on these previous treatments to aid these areas in becoming wildlife habitat again. This previous treatment lacks biodiversity.

I have observed bulbous bluegrass in areas the Forest Service doesn't show it to be present. To keep bulbous bluegrass from becoming the dominant grass on these areas, grazing should be closely monitored to make sure overgrazing does not occur.

Response: Bulbous bluegrass is an introduced species from Russia which has become widespread in the Great Basin. It is well adapted to winter rainfall zones and can spread rapidly on roadsides waste places and rocky slopes. It is aggressive and readily invades disturbed areas and occasionally moves into established stands of some species. It produces abundant seed even in dry years, grows aggressively in areas where spring and fall precipitation totals more than 10 inches and at elevations from 2,000 to 6,000 feet. It does well on dry gravelly soils that are low in organic matter (Hull 1940). It is persistent, highly competitive, aggressive, and easily regenerates itself. Often it becomes a dominant species on disturbed areas where it is adapted and may persist as a monoculture.
(http://est.usu.edu/agx/ResearchReports?USDAREPORT/bulbous.html 12/98)

Alternative H proposes to treat 2,500 acres of bulbous bluegrass over the next ten years to improve understory diversity and production using both native and desired non-native species in revegetation efforts after treatments. Bulbous bluegrass is not a desirable species for wildlife nc for livestock grazing. While we have tried to identify areas that are dominated by bulbous bluegrass (See map in Chapter 3 of the EIS), we also know that blubous bluegrass can be found in other areas of the Grassland. We are priortizing bulbous treatments in areas where it is prevalent in the understory and where treatments will improve wildife habitat diversity and production. Livestock grazing is eliminated in treatment areas during the treatment process and allowed to return only after the site is considered ready for livestock grazing.

Category **Comment Noted**

Letter Number *46 - Curlew DEIS* Comment ID 132

Comment: Please read, respect and respond to the research of the literature presented to you by Mr. Craig Criddle, Downey, Idaho, including his concerns about bulbous bluegrass.

Response: Thank you for your comment. The Interdisciplinary Team will "review, analyze, evaluate, and respond to substantive comments on the draft EIS", as specified in the Forest Service Environmental Policy and Procedures Handbook (FSH 1909.15, 24.1) and the NEPA itself (40 CFR 1502).

Letter Number *46 - Curlew DEIS* Comment ID 135

Comment: Any efforts made to enhance the availability of water for wildlife and also for livestock should be done in an absolutely "friendly-for-wildlife" manner.

Response: Site specific water development and fence locations are outside of the scope of this programmatic Curlew planning document. Those specific decisions would be made during the revision of the Allotment Management Plans (AMPs). The AMP revisions will be analyzed in a separate process and mitigations to make water developments "wildlife friendly" would be developed during that environmental analysis.

Category **Fire**

Letter Number *46 - Curlew DEIS* Comment ID 129

Comment: The USFS should cease the use of fire for any further removal of sagebrush and understory on the Greater Curlew.

Response: Thank you for your comment. Prescribed fire is considered to be one of several accpetable methods for treating areas with a dense sagebrush canopy. The selected alternative (Alternative H) allows prescribed fire on a limited basis, if necessary, to maintain the existing percent of acre in each sagebrush canopy cover class; however, Alternative H emphasizes the use of herbicide or mechanical methods to achieve this goal. It was the intent of the ID Team to provide the local land manager with all available methods of treatment, including prescribed fire. Prescribed fire would be used to treat bulbous bluegrass if no other methods are available. All acceptable treatment methods will be considered in detail by a subsequent site-specific analysis before any area is treated.

Category **Livestock grazing**

Letter Number *46 - Curlew DEIS* Comment ID 134

Comment: Manage all livestock on a very stringent and monitored rest. rotation cycle that places the needs of sage grouse ahead of that of livestock…especially where grouse have their young in spring and summer and along all riparian areas.

Response: Sage grouse are just one of the management issues on the Curlew Grasslands. The alternatives were developed to address all the issues, and meet them to varying degrees, as described in the EIS.

NEPA requires that the Forest Service develop alternatives to address issues. Wildlife, sage grouse in particular, are a significant issues that we addressed in the alternatives. The NFMA also requires the Forest to maintain viability of plant and wildlife populations. Sage grouse population decline has been a national concern for the past several years. For these reasons, we must address and mitigate effects to sage grouse. Alternative E addresses the needs of livestock producers above the other issues. Alternative C manages the Curlew primarily for upland birds.

Alternative H, the selected alternative in the Record of Decision, proposes to maintain the existing percentage of acres in each of the sagebrush canopy cover classes using light and heavy herbicide applications or other mechanical methods to thin the sagebrush canopy cover. These treatments would be prioritized in areas where sagebrush canopy cover is currently in greater than 25 percent. In addition, livestock utilization levels are flexible, allowing for heavier use in pastures dominated by crested wheatgrass and lower utilization levels on native sites or in areas considered important for nesting sage grouse. We believe this adaptive alternative, which includes focused monitoring, will allow current uses to continue while providing improvements in sagebrush habitat conditions, for the sage grouse and other sagebrush obligate species.

Category **Vegetation**

Letter Number *46 - Curlew DEIS* Comment ID 133

Comment: Cease in the use of any toxins for plant and/or animal control. The only exception would be in the use of herbicides for specific and/or eradication of designated noxious weeds.

Response: Some alternatives do not proposed the use of herbicides. Alternative A and D would not use herbicides to manage vegetation. Alternative A would use prescribed fire only while alternative D would not treat any vegetation by any method. In those alternatives that propose using herbicide to treat sagebrush, site-specific NEPA analysis would disclose the effects of herbicide applications within the site-specific project area.

Herbicides can be effectively used to reduce sagebrush canopy to a more desirable canopy cover class (16 to 25%) to improve wildlife habitat. The use of herbicide allows the manipulation of sagebrush canopy cover to increase understory vegetation diversity and is proposed in sever of the alternatives. The grass and forb understory are important habitat components for many species; for sage grouse these components are critical for nesting cover, and foraging habitat during brood-rearing. Other types of treatments, including bulbous bluegrass teatments, may increase grass and forb diversity/abundance but result in the loss of the sagebrush canopy. This will generally make the stand unsuitable for nesting until the sagebrush is reestablished to around 15-25% canopy cover.

Letter Number *46 - Curlew DEIS* Comment ID 130

Comment: Where any form of treatment has taken place, over the years, please reseed (sagebrush) in those areas lacking in 15% canopy cover or less. Also reseed as much as possible by replicating all of the other natives under and between story botany.

Response: Alternative H, the selected alternative, proposes to use native and desirable non-native grasses, forbs and shrub seed mixes, some of which are listed in Appendix C of the Grassland Plan. Other native and non-native species not listed in Appendix C of the Plan will be considered at the site-specific project level.

Vegetation treatment proposals at the site-specific level will determine what type or method of treatment is needed, what species will be used, if needed, to re-seed treated sites. In some cases, sagebrush seeds could be part of the seed mix if needed to maintain sagebrush canopy cover classes over the ten-year Plan period.

Category **Wildlife**

Letter Number *46 - Curlew DEIS* Comment ID 131

Comment: Give the strongest possible consideration to the Idaho F&G biologists' recommendations as to improving and maintaining optimal habitat for the indigenous sage grouse and the other native plants and animals, including the positions of Drs. Connelly, Apa, et al.

Response: Alternatives have been analyzed and compared as to how well they meet the Guidelines (Connelly, et al, 2000). These Guidelines are the most current, peer-reviewed Guidelines for the management of sage grouse habitats.

In addition, the Grassland Plan includes a goal to develop a map in cooperation with IDFG to identify functional and degraded breeding habitat and winter habitat (See Chapter 3, Wildlife Habitat Management).

Category **Comment Noted**

Letter Number *47 - Curlew DEIS* Comment ID 277

Comment: If you use Alternative G you will only be managing for sagebrush and sage grouse.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. Generally the decision maker chooses the alternative which best meets the Purpose and Need. The Record of Decision will disclose and explain the reasoning behind his choice of alternatives.

Sage grouse habitat is one of the significant issues and according to NEPA, we must develop alternatives to address those issues. In addition, the NFMA requires that we maintain viability for wildlife species. Since sage grouse numbers west-wide are declining, the Forest must insure its management is not contributing to a loss of viability.

We respectfully disagree that Alternative G, the preferred alternative, will only manage the resources for sagebrush and sage grouse. Alternative G would allow livestock grazing to continue, albeit at a reduce rate, provide recreational opportunities, improve water quality and riparian areas, and allow some improvement in understory vegetation diversity for wildlife and livestock grazing.

Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Letter Number *47 - Curlew DEIS* Comment ID 281

Comment: If you continue the management of the grasslands with Alternative A, it will preserve the viability of the sage grouse population and encourage the whole ecosystem to flourish.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing with wildlife needs in an adaptive framework with focused monitoring.

Letter Number *47 - Curlew DEIS* Comment ID 276

Comment: After careful study of your own facts and research of the grasslands, we feel the current management of the grassland is a sound an progressive conservation and multiple use plan. It promotes the development of grassland agriculture and sustained yield management of the forage, wildlife, water and recreational resources in the Curlew Valley.

We recommend that the Forest Service continue to manage the grasslands under alternative A. This has worked for 35 years and why fix it if it is not broke.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alernative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Category **Fire**

Letter Number *47 - Curlew DEIS* Comment ID 279

Comment: Also, if you use Alternative G you will be in conflict with the National Fire Plan with an increase in sagebrush.

Response: The FEIS analysis acknowledged the intermixed land ownership patterns on the Grassland. We believe the Grassland should be treated as a wildland urban interface area, and the FEIS is in compliance with the National Fire Plan. The wildland fire hazard was one of the many factors considered in choosing among alternatives for managing the Grassland.

The selected Alternative (Alternative H) allows prescribed fire on a limited basis to maintain the existing percentage of acres in each sagebrush canopy cover class; however, the alternative emphasizes the use of herbicides or mechanical methods to achieve this goal. Prescribed fire would be used as part of the treatment for bulbous bluegrass areas if no other treatment methods are available. It was the intent of the ID Team to provide the local land manager all available methods of treatment to meet the goals of the Plan. Each vegetation proposal will require site-specific analysis and a disclosure of the effects of the treatment method chosen.

Category **Revised Plan**

Letter Number *47 - Curlew DEIS* Comment ID 280

Comment: We recommend you allow for more flexible management requirements to meet specific needs of riparian and upland areas within the grasslands.

Response: The Plan provides and adaptive approach to management by identifying monitoring to ascertain whether goals, objectives, standards and guidelines are being met. If resource conditions are not in alignment with the stated goals in the Plan, the Plan would be amended by either tightening up standards or loosening them, based on the findings of monitoring efforts.

Alternative H, the selected alternative in the Record of Decision, features adaptive management strategies and focused monitoring. This alternative manages riparian areas using riparian/wetland emphasis areas. Streams that have been assessed as "at risk" of properly functioning condition(about five mies) are corridor-fenced to accelerate recovery toward properl functioning condition. All other riparian areas, not currently fenced in riparian pastures, would be fenced into riparian pastures using existing fences were practical. Livestock utilization in riparian pastures would be based on the properly functioning condition status of the stream in each pasture. If the stream is not functioning no grazing or extremely limited grazing would be implemented. Streams that are healthy would be grazed at higher use levels as long as stream conditions are maintained.

The alternative also features adaptive strategies for upland grazing. For example, areas of the Grassland that are important for sage grouse nesting and brood-rearing would be grazed lighter while areas that support primarily crested wheatgrass in the understory would be grazed heavie to maintain the plant's vigor. Grazing patterns would most likely rotate through pastures year-to-year. This should result in a portion, if not all, of the Grassland providing adequate nesting cover for sage grouse.

Monitoring activities include annual livestock utilization on key areas and annual utilization mapping.

Category **Vegetation**

Letter Number *47 - Curlew DEIS* Comment ID 278

Comment: Also if you fence off more riparian areas, all you will do is create a hazard for wildlife and a bigg noxious weed problem.

Response: Alternative H, the selected alternative, reduces the amount of riparian corridor fencing from fourteen miles to about five miles on streams determined to be "at risk" from properly functioning condition where this type of fencing will benefit streamside and stream channel conditions. All other riparian areas not currently fenced into riparian pastures would be fenced into riparian pastures using existing fences.

Effects of fences on sage grouse are discussed in Chapter 4 of the EIS under each alternative discussion under the heading Wildlife Habitat Management. The guideline for the construction of new fence (General Habitat No. 3 in Connelly, et al, 2000) has been incorporated and will be applied during site-specific planning.

Noxious weeds usually are introduced to disturbed sites. Fencing off riparian areas may or may not have an affect on the establishment of weeds depending on a seed source and the existing cover. Noxious weeds that do become established, inside or outside of fences will be aggresively treated.

Category **Comment Noted**

Letter Number *48 - Curlew DEIS* Comment ID 125

Comment: I would like to compliment the Forest on the comprehensive EIS for the Curlew NG and express my strong support for Alternative G…Alternative G seems to be a reasonable compromise that should result in range and habitat improvements.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Based on public comments on the Draft EIS, the ID team developed Alternative H, a combination of features from several alternatives. We believe Alternative H provides a better balance between human uses, such as livestock grazing and wildlife needs using an adaptive framework that emphasizes focused monitoring activities.

Category **Livestock grazing**

Letter Number *48 - Curlew DEIS* Comment ID 128

Comment: Grazing should be deferred for a longer period on these (reseeded) areas, and grazing intensity should be lowered once they are grazed. Loss of forbs is a major problem in terms of bird habitat and every effort should be made to preserve/restore forb populations.

Response: Part of the objective of reseeding treated areas is to increase forb and grass diversity. The Grassland Plan includes a standard that says no livestock grazing will be allowed before seed set of the second growing season after seeding or until objectives have been met. This was added in response to comments such as yours. If monitoring shows that this management direction is not adequate, direction will be adjusted to meet vegetation and wildlife goals.

Category **Vegetation**

Letter Number *48 - Curlew DEIS* Comment ID 126

Comment: I am concerned about the plans for treating bulbous bluegrass infestation. The EIS implies that this is a tried and proven method, but supporting data or citations are not provided. How confident are you that this approach will work? I would urge you to consider alternatives to the burning/plowing method… would it be possible, for example, to burn and then treat areas with Roundup or perhaps Oust and then drill native seed species without plowing? Another possibility, perhaps, would be to treat smaller patches with herbicide and then hand plant container stock or desirable forbs into those patches.

Response: Other treatment methods may be considered at the site-specific project level and as new technology is developed.

Bulbous bluegrass was planted to stabilize the soils and for this purpose, it is an excellent plant. As our land management objectives changed over time, this plant was not the best for meeting new management objectives. However, the characteristics that made it an excellent plant for watershed stability, also made it difficult to get rid of. The current procedure for getting rid of bulbous bluegrass was developed with several people over time, trying many different technique until we found one that was mostly successful. Other treatments would be welcomed! New herbicides may be effective in the future or other combinations of treatments. Any treatment that meets the objectives would be considered and its benefits analyzed.

Letter Number *48 - Curlew DEIS* Comment ID 127

Comment: If you do implement the burn/plow approach, I strongly recommend that you plant only native species and the species mix be rich in forbs. My research at INEEL verifies the assertions in the EIS that crested wheatgrasses are very competitive, tend to produce monocultures, and will invade native habitat. Perhaps some non-native forbs, such as Lewis flax and small burnet could be included. WE have had excellent results seeding locally-collected Hedysarum. Taper-tip hawksbeard (Crepis) would be another good choice.

Response: Alternative H, the selected alternative, proposes to use native and desirable non-native grasses, forbs and shrub seed mixes, some of which are listed in Appendix C of the Grassland Plan. Other native and non-native species not listed in Appendix C of the Plan will be considered at the site-specific project level.

Category **Alternatives**

Letter Number *49 - Curlew DEIS* Comment ID 505

Comment: F. Each alternative that the USFS considers must meet seven requirements. 36 C.F.R. §219.19 (a)-(f). Several of these requirements are unmet. The USFS CNG has failed to:

- identify and/or select management indicator species for major biological communities (Le. riparian);

The CNG must select an indicator species for the riparian community to adequately consider the effects of the alternatives. 36 C.F.R. 219.19(a)(1)2. As the USFS well knows, riparian habitats are of primary importance to a large number of wildlife species. There are several species withir the CNG which could be used as an MIS species including the Scott's Oriole and Townsend's Big-eared Bat. (DLRMP 2-18), as well as native fish. However the USFS justifies its decision not to identify any MIS species for riparian areas because any such species at risk in the riparian areas are severely limited by the lack of streamside vegetation. (DLRMP 2-16,17,18; DEIS 3-36, 3-16); streamside vegetation in turn is limited by livestock grazing and other agricultural activities. (DLRMP 2-1 0; DEIS 3-16). Thus, in a clear example of circular reasoning, the USFS states that MIS are unnecessary or unavailable for riparian areas because "most reaches do not support healthy riparian vegetation." The riparian areas do not support healthy vegetation because "the majority of reaches ... have been rated as Nonfunctional" because "they have beer impacted by past activities" including livestock grazing (LRMP 2-15; DEIS 3-16). Clearly, if MIS for riparian systems were identified and their habitat requirements were managed for, the nonfunctional status of stream reaches could begin to be reversed. In addition, the Forest states that "no baseline surveys have been completed" (LRMP 2-15; DEIS 336) and at some point in order to monitor riparian habitat and water quality that lack of monitoring must be rectified. 36 C.F.R. § 219.19 (a)(1),(6).

Response: Individual species of neotropical migratory birds are often used as MIS, and were considered in the analysis; however because these species are not year-round residents and their populations are potentially affected by numerous other factors, they do not make good MIS. In addition, the Grassland provides limited riparian habitat.

Instead, breeding bird assemblages were used as indicators of biodiversity richness. They serve as focal species, giving a view of overall habitat integrity. As stated in the monitoring section of the Grassland Plan, breeding birds and willow shrub structure will be monitored at 5 year intervals to track trends in use based on vegetation structure.

Letter Number *49 - Curlew DEIS* Comment ID 498

Comment: Comparison of DEIS alternatives indicates a failure to provide a reasonable range of alternatives which would include an increase in sage grouse distribution and population viability, a conflict with 40 C.F.R. § 1508.25(b). None of the alternatives alone is adequate if habitat management for sage grouse is a priority (Braun 2001). The existing alternatives provide for a mere chance that sage grouse populations will increase due to an improvement in nesting and brooding-rearing habitat. (DEIS 4-165, 4-167). Given that the USFS is required to manage for the continued viability of all MIS species (36 C.F.R. §219.19), and since sage grouse are an MIS species within the CNG, this range of alternatives is clearly insufficient. The lack of a commitment to this MIS species becomes even more glaring in light of the fact that the USFS has entered into a sage grouse Memorandum Of Understanding with BLM, USFWS and the Western Association of Fish and Wildlife Agencies in which the USFS committed itself to increase sage grouse distribution and abundance, and to consider the guidelines of Connelly et al. (2000) (WAFWA, 2001). This limited range of alternatives does not conform with 36 C.F.R. § 212.12 (f) which requires a distribution between the "minimum resource potential and the maximum resource potential" (212.12(f)(1)), and requires alternatives to provide "different ways to address and respond to the major public issues, management concerns, and resource opportunities" (212.12(f)(4)). Here the USFS has chosen a narrow range of alternatives, none of which present the opportunity for adequate sage grouse protection and conservation despite the fact that sage grouse are currently a "major public issue" and an important "management concern.'

Response: We disagree with the commentor. We believe the range of alternatives meets the intent of laws and regulations regarding management of sage grouse habitat in balance with other resource needs.

The range of alternatives was developed to respond to the significant issues brought forward through public comments and scoping efforts. All alternatives must meet federal and state laws. It is clear in the analysis of environmental consequences that some of the alternatives better meet the needs of sage grouse when compared to other alternatives that emphasize the resolution of other issues, such as vegetation condition or commodity uses. The range of alternatives includes Alternative D that proposes no grazing or vegetation treatments to Alternative A which proposes higher livestock utilization and more vegetation treatments than any of the other alternatives. We feel this range of alternatives provides the deciding official with a reasonable range of alternatives to select from.

In addition, based on public comments on the DEIS, the ID Team developed Alternative H, the selected alternative, a more adaptive alternative that includes focused monitoring to better under the long-term effects of management actions.

This alternative would maintain the current percent of acres in each sagebrush canopy over clas over the ten-year plan period through a variety of vegetation treatments and incorporates adaptive management strategies and focused monitoring. In addition, upland utilization levels would be established at 50 percent grassland-wide with further refinement in Allotment Management Plan updates. Corridor fencing would be reduced and applied only on "at risk" streams (approximately 5 miles) that would benefit from fencing. The remaining perennial streams would be fenced into riparian pastures using existing fences where feasible. Riparian livestock utilization would be determined based on the properly functioning condition of the stream. Those streams that are non-functioning would be grazed using light utilization standards, while those streams in properly functioning condition would be grazed at a level that maintains properly functioning condition.

Sage grouse are just one of the management issues on the Curlew Grasslands. The alternatives were developed to address all the issues, and meet them to varying degrees, as described in the EIS.

Category **Comment Noted**

Letter Number *49 - Curlew DEIS* Comment ID 510

Comment: The effects of predator control projects are not considered within the DLRMP, yet predator control projects are proposed for 2000 on the CNG, ostensibly to "enhance" sage grouse populations. Predator control projects may confound determining the relationships between habitat changes and population trends of sage grouse, and in any case are not adequately considered in this document as required. 36 C.F.R. § 219.19 (a)(5).

Response: There are numerous factors which may be contributing to the decline of sage grouse populations (listed in Chapter 3, Wildife Habitat Management), one of which is predation. These factors have been addressed in the Sage Grouse Population Trend analysis but predator control is beyond the scope of this project. Predator control projects are proposed, funded and carried out by other agencies.

The focus of the Curlew Grassland Plan is management of sagebrush habitats, both through livestock management and vegetation treatments. Sage grouse are an issue and a range of alternatives have been developed to address sage grouse habitats. All alternatives address sage grouse guidelines to varying degrees.

Predator control is outside the scope of this analysis.

Letter Number *49 - Curlew DEIS* Comment ID 515

Comment: We and others share the opinion that alternative C, with significant modifications, offers the most for improving sage grouse habitats and populations. Tree row treatments should be removed from Alternative C and more emphasis placed on decreasing the percent of the area in the 0-5 % sagebrush canopy cover class and increasing the amount in the 6-15 and > 15 % canopy classes. Burning to remove sagebrush is generally extremely negative and wild fires should be vigorously controlled (Braun 200 1).

Response: In comparing all of the alternatives, you are correct that Alternative C would best address the issue of sage grouse habitat management. On the other hand Alternative C would be less responsive to other issues, such as economic and social issues or improving understory vegetation diversity. In addition, the rate of achieving other vegetation objectives would take longer in Alternative C than in several of the other alternatives.

The deciding officer, in this case the Intermountain Region's Regional Forester, must evaluate all of the benefits and tradeoffs of each of the alternatives and select an alternative that best responds to all of the issues while allowing the Forest Service to meet the legal requirements of all pertinent laws under which the agency operates. Long-term sustained yield and multiple uses of the resources now and for future generations is the underlying goal of all management decisions made by the Forest Service.

We believe Alternative H, the selected alternative in the Record of Decision, provides a balance between human uses, such as livestock grazing, and wildlife needs. It uses an adaptive frameowrk with emphasis on focused monitoring efforts.

Category **Fire**

Letter Number *49 - Curlew DEIS* Comment ID 511

Comment: The DLRMP also fails to adequately consider the potential of prescribed fire to increase the distribution and density of cheat grass (Bromus tectorum) on the CNG. Cheat grass has been clearly shown to shorten subsequent fire frequencies in sage-steppe habitats, and to thus impair the quality of sage grouse habitat (Connelly et al, 2000).

Response: We agree that cheatgrass degrades sage grouse habitat and increases fire frequency. Any area proposed for prescribed fire treatment will receive a thorough site-specific analysis of the risk of spreading noxious weeds, including cheatgrass, and will not be treated if there is a significant risk of spreading noxious weeds. We have been very successful at controlling the introduction and spread of cheatgrass on the Grassland in the past and expect our efforts to continue in the future.

Approximately 15,700 acres on the Grassland have been identified as areas that should not be treated or should be treated using only certain techniques because they may be prone to invasion of annuals such as cheatgrass once disturbed.

Category **Livestock grazing**

Letter Number *49 - Curlew DEIS* Comment ID 496

Comment: As regards the intensity of livestock grazing, for example, instead of an upland utilization standard the DEIS should include an upland understory vegetation stubble height standard of at least seven inches. Since there is not a dependable correlation between utilization rates and stubble height (DEIS 3-79), an upland stubble height standard is the only way to accurately assess whether the understory habitat requirements are being met as per Connelly et al. (2000).

Response: Alternative H, the selected alternative in the Record of Decision, contains guidance for lower use levels in sage grouse nesting habitat. Measurements in 2001 showed that during a drought year, fifty pecent utilization averaged a five-inch stubble height. Based on this information, the FEIS determined that it would "improve nesting success and brood survival." (See FEIS, Chapter 4, Alternative H, Wildlife, Sage grouse, Guideline #1.)

Category **Revised Plan**

Letter Number *49 - Curlew DEIS* Comment ID 526

Comment: Priorities - Four priorities are identified (2-3) for expenditure of dollars. Reordering of these priorities should be considered with monitoring (including managing numbers of livestock) being most important followed by limited treatment of sagebrush communities. Improvement of riparian areas will have the least positive impact on sage grouse provided that livestock stocking rates and timing of grazing are managed to not exceed removal of 25-30 % of the annual herbaceous forage that is produced.

Response: We believe that grazing administration is the first priority for commitment of funds. Permit administration is a form of monitoring that includes working with permittees to ensure that livestock grazing occurs within the standards necessary to protect resources. Priority 1 monitoring and efforts to recover and maintain riparian function remain higher priority than limited treatments of sagebrush. Gaining new understanding of the critical resource issues where information is presently lacking and restoration of watersheds is more important than vegetation treatments.

Permit administration includes all of the monitoring and enforcement included in grazing administration on the CNG. It includes utilization monitoring, enforcement of utilization standards, maintenance requirements, etc.

Category **Riparian Areas**

Letter Number *49 - Curlew DEIS* Comment ID 504

Comment: Riparian habitat goals should clearly state a commitment to improvement or restoration- a "maintenance" goal is not adequate. As with monitoring of upland vegetation conditions, grazing utilization rates should be replaced with stubble height standards. Streams which currently support fish, or which historically did, should have at least a 300 foot buffer established on each side, as detailed in INFISH guidelines. The discussion of riparian/wetland areas states that several channel reaches are considered functional but "at risk of degradation" from a variety of factors including grazing impacts. (DLRMP 2-10; DEIS 3-16). The majority of the over 20 reaches are rated "Nonfunctional" (Id.) Several small wetlands occur in the CNG, all of which are impacted by livestock except Sweeten Pond which is in good overall condition. Sweeten Pond also happens to be the only pond which the USFS has given the requisite "special attention" by limiting livestock from the pond. (Id.) At a bare minimum, NFMA requires a 100 foot buffer zone, or zone of "special attention" for all riparian areas. 36 C.F.R. § 219.27 (e).

Response: Not all riparian areas within the Grassland are in a deteriorated condition. In areas where stream channels and riparian areas are functioning properly, conditions will be "maintained". Where conditions are less than desired, management actions will be taken to "improve" those areas. Riparian Wetland Areas (RWAs) are portions of watersheds where riparian-dependent resource receive primary emphasis, and management activities are subject to specific standards and guidelines. Specific buffer widths are not exact thresholds, but serve to guide managers in determining zones generally needed to protect RWA values. These size of these zones may vary depending on a variety of local factors. The intent of establishing the RWAs is NOT to provide an exact width but to maintain those areas that are considered to be in "good" condition, and restore those areas that are in a deteriorated condition. The ability of any specific RWA to provide these needs will vary site-by-site. It is possible that salmonids occupied the streams within the Grassland when Lake Bonneville was in place, as these streams were probably connected to the lake. However, there is no known documented evidence of native salmonids occupying streams within the Grassland within recent history. The Goal for RWA is to maintain or restore the function of these areas. NFMA states: "Special attention shall be given to land and vegetation for approximately 100 feet from the edges of all perennial streams, lakes, and other bodies of water. This area shall correspond to at least the recognizable area dominated by the riparian vegetation. No management practices causing detrimental changes in water temperatures or chemical composition, blockages of water courses or deposits of sediment shall be permitted within these areas which seriously and adversely affect water conditions and habitat." The proposed RWA widths should be adequate to provide those functions and needs within the Grassland. In some situations, 75 feet may be more than adequate to protect these values. In other situations, 300 feet may be too small. When fence-lines are located, consideration will be given to any oxbows or other features that may be related to the stream channel, riparian area and/or wetland. In some locations, where site-specific situations warrant, the RWA distances may be expanded, or even reduced somewhat to ensure resource values are protected and to facilitate construction needs.

Category **Vegetation**

Letter Number *49 - Curlew DEIS* Comment ID 522

Comment: Vegetation Treatments - Because of past management, many areas on the CNG may require treatment if sage grouse are a priority species. Connelly et al. (2000) provide recommendations for types of treatments that are known to not negatively impact sage grouse populations. In general, brush beating is preferred in many locations as the results can be predicted and escapement of the treatment into adjacent areas that may have high value for sage grouse is unlikely as may occur with prescribed fire and aerial application of herbicides. Multiple treatments within 10- 1 5 years are generally not desirable as natural events such as wild fire, drought, and insects may be sufficient to maintain multiage stands of sagebrush. Brush beating, disking and reseeding, and similar treatments, when done in strips with untreated strips twice the width of the treated strips, will have the least negative impact on sage grouse provided that no more than 30% of the habitat to be treated is impacted within a 10- 1 5 year interval. Burning to remove sagebrush is generally extremely negative, especially where fire return intervals are less than 40 years. Thus, wild fires should be vigorously controlled and all prescribed bums should be less than 120 acres in size.

Response: Options for treating sagebrush in Alternative H, the selected alternative, are limited prescribed fire activitiy, plowing, reseeding with native and desired non-native species where bulbous bluegrass is prevelant in the understory, and using a combination of light and heavy herbicide applications and mechanical methods outside of bulbous bluegrass areas to maintain the existing sagebrush canopy cover classes on the Grassland. Other methods of treatments would be considered at the site-specific level of analysis such as brush beating, chaining, disking, and new technology or methods as they are developed.

Of the 12,100 acres that are proposed for treatment in Alternative H, none are expected to be treated more than once during the next 10 to 15 year period. Less than 30% of the habitat will be treated over the next 10 to 15 years. Wildfires will be aggressively suppressed in all alternatives. Treatment size will be determined at the site-specific level based project goals and objectives.

Your suggestion regarding leave strips, brush beating and reseeding are certainly viable and could be considered at the site-specific project level.

Letter Number *49 - Curlew DEIS* Comment ID 500

Comment: The primary biological justification for the sagebrush treatments is the control of bulbous bluegrass (Poa bulbosa). Bulbous bluegrass is not classified as a "noxious," "undesirable" or "invasive" plant by any recognized scientific or regulatory entity (PCA 1999). The USFS has not made a substantial argument that bulbous bluegrass poses a threat to the quality of sage grouse habitat or the viability of sage grouse or other wildlife populations. The Forest has not provided data which show that bulbous bluegrass poses a greater threat to sage grouse or other wildlife resources on the CNG than the proposed treatments to control this grass, or that the treatments will significantly improve the long-term habitat quality for sagebrush obligated wildlife species on the CNG.

Response: Bulbous bluegrass starts growth early in the spring, matures ahead of other grasses and is fairly short on the Grasslands. It completes its annual cycle very quickly, thus it doesn't provide much forage. Leaves dry up and blow away by August. Since it is an early grower, it often successfu outcompetes native species for spring moisture, thus reducing understory grass and forb diversity. In a field review of the CNG, the IDT measured stubble heights of the understory grasses. Typically, ungrazed bulbous bluegrass leaves were 1-2 inches tall, while ungrazed crested wheatgrass plants were 12-16 inches tall. While bulbous plants average one inch in diameter, crested wheatgrass bunches average 6-8 inches across (Field Notes, 9/01). For the reasons mentioned above, bulbous bluegrass provides little sage grouse cover, even when ungrazed.

Bulbils do add to the palatability of dry forage and the starch and fat content make them attractive to rodents and birds (Pacific Northwest Extension Publication 467, July 1994).

More information on the ecology of bulbous bluegrass can be found in Disturbance section in Chapter 3 of the EIS.

Letter Number *49 - Curlew DEIS* Comment ID 501

Comment: We cannot support the use of prescribed burning or plowing of bulbous bluegrass since the Forest has not carefully considered the potential impacts to sage grouse and their habitat. For example, the variance which allows bulbous bluegrass treatments within sage grouse lek buffer is not acceptable (DLRMP, Summary- 1 6). Treatments within these lek buffers violate the most current version of the Idaho State Sage Grouse Management Plan (IDFG 1997) and guidelines on sage grouse habitat management (Connelly et al. 2000), which clearly recommend against disturbing habitats within < 5 km. of occupied sage grouse leks. This could effect sage grouse both at leks and the use/availability of nearby security cover within dense sagebrush stands.

Response: Alternative H, the selected alternative, maintains a 1/4 mile buffer around active leks during vegetation treatments. In addition, treatments within 5 km of leks would be evaluated relative to habitat restoration guidelines. This includes looking at the limiting vegetation factors and the effects of proposed type of treatments. There are several guidelines in the Grassland Plan that address treatments in relation to sage grouse habitat.

Letter Number *49 - Curlew DEIS* Comment ID 499

Comment: The CNG should not undertake treatments in sage grouse habitats, particularly stands of 15-25% sage canopy coverage, without consultation and consent from the Idaho Dept. of Fish and Game, the agency with authority over management of sage grouse. 36 C.F.R. § 219.19(a)(3).

It is clear from the critical comments submitted by the IDFG regarding the DEIS and DLRMP, and by failing to adhere to either the terms of the Idaho State Sage Grouse Management Plan or the authoritative guidelines of Connelly et al, (2000), that the Forest has failed to develop procedures to maintain or improve sage grouse habitats, or to adequately consult with IDFG.

Response: The Grassland Plan includes a guideline prioritizing treatments in the >25% canopy cover class to address nesting habitat concerns. The Plan includes a goal to map in cooperation with Idaho Department of Fish and Game, functional and degraded breeding and winter habitat. IDFG would be involved at the project level; however, the Forest Service is the land management acgency, and consent from IDFG is not needed.

IDFG has had a representative on the ID Team since the beginning of the project. IDFG continues to have questions and concerns about management on the Curlew and the effects of that management on sage grouse. The Guidelines (Connelly, et al, 2000) have been incorporated into the analysis and are also incorporated into the Grassland Plan. We are continuing to work with IDFG to address concerns, and will continue to do so at the site-specific project level.

Letter Number *49 - Curlew DEIS* Comment ID 509

Comment: The accuracy of satellite-based GIS mapping of shrub habitat types was low in the early 1990's, and accuracy continues to be problematic even today, requiring intensive ground-truthing. It is not clear how much ground-truthing of satellite data has been conducted on the CNG to assess the accuracy of the Prevedel GIS data (Appendix G-15). Does the USFS possess data showing that the resolution of the Prevedel GIS can distinguish, for example, between rabbitbrush (Chrysothamnus spp), rock, and sagebrush? This is critical because large portions of the CNG have substantial canopy coverages of rabbitbrush (as well as other non-sage shrub species), both naturally and as a result of overgrazing by livestock, plus substantial areas of exposed rock. Both non-sage shrub species and dark-colored rock can register a satellite signature similar to sagebrush. Rabbitbrush and bare rock has no documented utility for sage grouse. If the Prevedel GIS data is assumed to be accurate, when in fact a substantial possibility exists that it over-estimates the amount of suitable sagebrush habitat currently present on the CNG, then the results of the VDDT model, which provide projections of future sage canopy under the various alternatives, are inaccurate.

Response: While we agree that satellite imagery may have some limitations, it was not the intent of Prevedel's work to delineate every vegetation type on the Grassland. The main focus of the study was to determine sagebrush canopy densities using reflectants. The Prevedel GIS satellite data was ground-truthed using transects by Ken Timothy, Alma Winward, Jerry Tower and John Lott. The ID Team also completed transects in September 2001 to insure that Prevedel's data was reasonably accurate.

We are currently investigating the possibility to use additional imaging methods to delineate various vegetation types, including various species of sagebrush, rabbitbrush, and mountain brush types found on the Grassland.

Letter Number *49 - Curlew DEIS* Comment ID 502

Comment: Understanding the autecology of bulbous bluegrass as well as the timing and intensity of the prescribed fire is critical to its management. While a prescribed bum will remove the standing biomass of bulbous bluegrass, that does not mean it will be eradicated or even suppressed long-term. Authorities admit that the proposed treatments can not be reasonably expected to eradicate bulbous bluegrass. In a phone conversation with Dr. Alma Winward on March 19, 2001, he stated that he was not aware of any data showing that previously implemented prescriptions (burning, cropping, and replanting of other species) to eradicate bulbous bluegrass from stands were successful. In fact, he stated that bulbous bluegrass was likely still present in previously treated fields such as the West Jacobson field, and that excessive grazing by cattle is one factor which could allow it to increase again (Deeble, pers. comm. 3/19/01).

Response: The bulbous bluegrass treatment is experimental at this time. We have had some success on some fields on the Grassland, but other fields are showing that bulbous bluegrass is returning. We are not sure if the treatment method was modified or if the treatment site itself had some factor(s) that resulted in less successful outcomes. It is important to remember that most of the Grassland has been plowed and farmed, many times over in some locations. The fact that farming practices, such as the use of herbicides and pesticides, or evironmental factors, such as the Great Dust Bowl, may have altered the soil profile on some areas of the Grassland. While the BLM has had some limited success of bulbous bluegrass treatment using Oust and Plateau, two herbicides, these herbicide treatments are experimental, as well.

The Grassland Plan is based on adaptive management with focused monitoring to help us better understand how vegetation treatments using various methods affect the resources. If a new or different method of treating bulbous bluegrass is developed, the Plan would permit us to try new methods. These decisions would be made at the site-specific project level, based on site-specific conditions and project goals and objectives.

Letter Number *49 - Curlew DEIS* Comment ID 503

Comment: Finally, any vegetation treatments are entirely unacceptable when they are not predicated on the guaranteed availability and funding for the purchase of native seed, including sagebrush, for replanting. Otherwise, reseedings after treatments of bulbous bluegrass may be dominated by exotic and inexpensive species such as crested wheatgrass (Agropyron desertorum), a species which arguably causes more degradation of sage grouse habitat than bulbous bluegrass in the CNG region (DEIS G- 14). Perhaps the DEIS should apply similar justifications as were used for treating bulbous bluegrass, and consider treatments to suppress or eradicate crested wheatgrass.

Response: Bulbous bluegrass and crested wheatgrass were planted on the CNG in the 1940's and 1950's to help stabilize soils. They are vastly different plants: crested wheatgrass is a tall, robust bunchgrass while bulbous bluegrass is a low growing grass. In a field review of the CNG, the IDT measured stubble heights of the understory grasses. Typically, ungrazed bulbous bluegrass leaves were 1-2 inches tall, while ungrazed crested wheatgrass plants were 12-16 inches tall. While bulbous plants average one inch in diameter, crested wheatgrass bunches average 6-8 inches across. Thus, crested wheatgrass provides much more wildlife cover and forage as well as better soil protection. We have reviewed the portion of the DEIS you referenced and are unsure how you interpreted the information to say that crested wheatgrass degrades wildlife habitat more than bulbous bluegrass. For the reasons mentioned above, bulbous bluegrass provides little sage grouse cover, even when ungrazed.

There are approximately 36,000 acres on the Curlew that were planted with these nonnative species at some point in time. Because of the low watershed, wildlife, and livestock value of bulbous, we have made it a treatment priority. The ID Team considered an alternative that would return the Grassland to pre-settlement conditions (See Chapter 2, Alternatives Considered But Dropped From Further Analysis). The ID Team discussed reseeding all of the crested wheatgrass acres, but it is not ecologically or economically feasible at this time.

Letter Number *49 - Curlew DEIS* Comment ID 513

Comment: No studies are proposed to determine if bulbous bluegrass treatments at leks cause lower lek attendance related to disturbance (as distinguished from downward population trends). No studies are planned to determine if future downward trends of sage grouse populations are related, for example, to proposed treatments of sagebrush away from leks, the overall effects of livestock grazing on herbaceous understory, the planting of tree rows, riparian management, or other proposed changes in grouse nesting habitat, brood habitat, or winter habitat.

Response: The Curlew National Grassland consists of three units, with private land within and adjacent to all three units. About 60 percent of the CNG is managed by the Forest Service, but this is only about 9 percent of the Greater Curlew Valley. Leks, nesting, brood-rearing and winter habitat are found on various land ownerships, with sage grouse moving across the area. The Forest Service cooperates with IDFG to do sage gouse lek counts on the Grassland and Greater Curlew Valley Area.

Because of the complex relationships between land ownership, use by sage grouse and vegetation treatments on the Grassland, it is assumed that if proposed treatments follow the Guidelines (Connelly, et al, 2000) that habitat for sage grouse will be improved and populations should increase. Monitoring of vegetation treatments (Chapter 5, Grassland Plan) will be done before the project and at Year 2, Year 5 and Year 10 following the project to see if vegetation treatments are meeting Grassland Plan goals and objectives.

Letter Number *49 - Curlew DEIS* Comment ID 508

Comment: It is not possible to accurately predict the effects of the alternatives on the quantity and quality of sage grouse habitat if basic assumptions of the VDDT model are inaccurate. We question the assumptions used in the VDDT model, particularly the canopy closure assumption that 0-5% canopy cover of sage will move to 6-15% canopy cover in 10 years. This appears unrealistic, a big sagebrush species are killed by fire, slowly mature, and are poor seed dispersers.

Response: In Chapter 4 of the EIS under the Sagebrush Canopy Cover subheading it states that "monitoring information from past treatments and information from fire effects (Blaisdell, et al,1982; Bunting, et al,1987) indicate treated sagebrush sites on the Grassland in 0-5 percent canopy cover reach 15 percent canopy cover in 20 to 30 years." Appendix E of the EIS describes how the VDDT model works and the assumptions the ID team used in modeling vegetation outcomes on the Grassland for each alternative.

Approximately 10 years is required to achieve the 6-15 percent canopy class from the 0-5 class; 10 more years is required to achieve sagebrush canopy densities greater than 15 percent in basin and mountain big sagebrush types. An additional 10 years or more would be required to achieve canopy cover densities of 25 percent. These assumptions are based on information from site-specific monitoring and scientific literature mentioned above. The model is designed to show relative differences between alternatives and not designed to portray absolute results.

Category **Wildlife**

Letter Number *49 - Curlew DEIS* Comment ID 506

Comment: Each alternative that the USFS considers must meet seven requirements. 36 C.F.R. §219.19 (a)-(f). Several of these requirements are unmet. The USFS CNG has failed to:

- adequately evaluate the quantity and quality of habitat, or the population trends, for MIS species such as sage grouse;

The CNG has failed to properly or accurately evaluate the quantity and quality of habitat, or the population trends, for existing MIS. 36 C.F.R. §219.19 (a)(6). The DLRMP and DEIS has reported lek counts, but has failed to analyze or assess the implications and clear trends revealed by those counts. Lek counts show a clear and ongoing population decline for sage grouse, which suggests potential extirpation in the near future (see Fig. 1, attached). With the current small effective population size, the persistence of sage grouse on the CNG for 20 or more years is questionable (Braun 2001).

Response: The final EIS includes updated and additional information on sage grouse population trends. Appendix I contains a comprehensive review of all available information at the time of this analysis. Some of this information has also been included in Chapter 3 in the Wildlife Management Section. The Biological Evaluation and Biological Assessment for Alternative H, the selected alternative in the Record of Decision, can be found in Appendix J.

Letter Number *49 - Curlew DEIS* Comment ID 497

Comment: Lek counts for sage grouse, the sole Management Indicator Species (MIS) on the CNG, indicate a continued downward population trajectory under current land management practices (see Figure 1, attached). The DEIS and DLRMP have failed to fully consider the habitat requirements of this MIS. The draft plan states that the impacts of management of sagebrush in alternative G "are not significantly different than the current situation." (DLRMP 4-169). The current situation is that the population of sage grouse on the CNG is in sharp decline, and that past and current habitat management, including treatments to reduce sagebrush canopy cover, is a significant contributing factor. Clearly, habitat management which differs from the current situation, and which differs from the preferred alternative, is needed to suspend or reverse the ongoing decline of sage grouse on the CNG. Therefore, adoption of alternative G violates USFS regulations which require that habitat be managed to maintain viable populations of native species. 36 C.F.R. § 219.19.1 NFMA prohibits adoption of a plan which could reasonably lead to the extirpation of a vertebrate species from Forest lands (Id.)

Response: The Final EIS includes updated and additional information on dage grouse population trends. Appendix I contains a comprehensive review of all available information at the time of this analysis and discusses contradictions in population numbers. Some of this information is also oin included in Chapter 3 under Wildlife Habitat Management. The Biological Evaluation and Biological Assessment for Atlernative H, the selected alternative in the Record of Decision, is found in Appendix J.

The statement you have referenced is from the "Cumulative Effects" section of the EIS which encompasses past, present and reasonable foreseeable actions, not only on the federally-administered portion of the Grassland but actions from adjacent landowners. To be clear the entire statement reads, "When these off-site and past conditions are combined with the management of sagebrush in this alternative, the negative impacts on sage grouse populations are not significantly different than the current situation. The expanded riparian zone with minimal grazing will improve the late summer brooding habitat. "

Vegetation proposals in Alternative H, the selected alternative, would maintain the number of acres in the greater than 15% canopy cover class, from about 59% of the acres today to 60% of the acres at the end of the 10-year planning period. While Alternatives C, D, and G would result in a slightly higher percentage of acres in the greater than 15% canopy cover at the end of the 10 year planning period, greater improvement could be expected in understory vegetation for brooding in Alternative G and H than in either Alternative C or D.

Letter Number *49 - Curlew DEIS* Comment ID 507

Comment: The CNG has failed to evaluate how the quality of sage grouse habitat will be effected by planting twenty-one miles of tree rows. Trees, particularly Russian olive, are not native to habitats of the CNG. The planting of trees are clearly contrary to the guidelines of Connelly et al (2000) because of the resulting habitat fragmentation and degradation for sage grouse.

Response: Effects of tree rows on sage grouse are discussed in Chapter 4 under each of the Alternative discussion sections. See Wildlife Habitat Management under each alternative.

The selected alternative does not propose additional tree row planting. The Curlew National Grassland currently has in place approximately 21 miles of tree rows.

Letter Number *49 - Curlew DEIS* Comment ID 512

Comment: The DLRMP and DEIS does not present or describe how it will determine the relationships between sage grouse population trends and proposed habitat changes. Such monitoring and data gathering for MIS species is required. 36 C.F.R. § 219.19 (a)(2), (6); see also Sierra Club v. Martin, 168 F. 3d 1, 7-8 (I Ith Cir. 1999). For example, no additional scientific studies to correlate habitat changes with population trends of sage grouse or other avian species are proposed. Instead the DEIS and DLRMP appear to dismiss many conclusions of habitat and population management documents based on numerous scientific studies (Paige and Ritter 1999; Connelly et al. 2000).

Response: The final EIS includes additional information on sage grouse population trends. Appendix I contains a comprehensive review of all information available at the time of this analysis. Some of this information has been included in Chapter 3 in the Wildlife Habitat Management section, as well. In Chapter 4, habitat changes are discussed for each alternative based on proposed vegetation treatments. In addition, the biological Evaluation and Biological Assessment for Alternative H, the selected alternative in the Record of Decision, can be found in appendix J.

The Curlew National Grassland is comprised of three units, with private land within and adjacent to all three units. About 60% of the CNG is managed by the Forest Service, but this is only about 9% of the Greater Curlew Valley. Leks, nesting, brood-rearing and winter habitat are found on various land ownerships, with sage grouse moving across the area. The Forest Service does cooperate with IDFG to do sage gouse lek counts on the Curlew Grasslands and Greater Curlew Valley Area.

Because of the complex relationships between land ownership, use by sage grouse and vegetation treatments on the Curlew, it is assumed that if proposed treatments follow the Guidelines (Connelly, et al, 2000) that habitat for sage grouse will be improved. Monitoring of vegetation treatments will be done before the project and at 2, 5 and 10 years following the project to see if they meet the project objectives.

Letter Number *49 - Curlew DEIS* Comment ID 495

Comment: Preferred alternative G proposes the destruction of habitat types (more than 5000 acres of >1 5% canopy cover sagebrush, (Artemesia tridentata spp.) which are scientifically recognized as critical to maintaining sage grouse (Centerocercus urophasianus), and fails to propose measures to adequately increase the understory of herbaceous vegetation in upland sites (Connelly, Braun Schroeder and Sands 2000). Connelly et al. (2000), represents the best available peer-reviewed information on the habitat requirements of sage grouse. Sage grouse nesting habitat requirements are characterized by sagebrush of 15-25% canopy cover and residual herbaceous vegetation of at least seven inches in height; these guidelines should be incorporated into the DLRMP and the DEIS. (Connelly et al 2000). The DLRMP and DEIS should, but fails to, state how the two habitat requirements of adequate sage canopy cover and herbaceous understory w be achieved or assessed under any alternative.

Response: Alternative H, the selected alternative in the Record of Decision, maintains the existing sagebrush canopy cover classes over the ten-year Plan period using a combination of light and heavy herbicide applications or mechanical methods. Vegetation treatments are prioritized in areas of the Grassland that have sagebrush canopy cover in greater than 25 percent. Understory vegetation would be expected to improve in production without reseeding. Diversity of species would not. In bulbous bluegrass treatment areas, both native and non-native seed mixes are allowed depending on the site-specific project goals. Either of these seeding alternatives could result in an improvement in understory production and diversity, based on the seed mix used. These decisions would be made at the site-specific project level.

In addition, Alternative H uses adaptive management in livestock management by applying lighter utilizaiton levels in areas that are important for sage grouse nesting and brood-rearing while allowing heavier utilization in areas where the understory is predominantly crested wheatgrass to maintain the plant's vigor over time. Grazing patterns would most likely rotate in pastures over time. As a result, a portion, if not all, of the Grassland should provide adequate residual vegetation of nesting and brood-rearing sage grouse on an annual basis.

Focused monitoring also includes annual utilization monitoring on key areas and annual utilization mapping.

Changes in understory diversity are addressed for each alternative, under the heading "Vegetation Understory Composition". In addition, a qualitative assessment of upland utilization levels and residual vegetation is presented for each alternative, under the heading "Effects on sagebrush species."

Letter Number *49 - Curlew DEIS* Comment ID 525

Comment: Monitoring - Management agencies have the responsibility to support monitoring of the results of treatments on responses of vegetation and sage grouse over time. Consistency in methodology used, with proper sampling design, is important for repeatable results because personnel change over time. Preparation of reports of findings that can be easily accessed is critical to understanding what was done, why it was done, and if the treatment achieved the desired goals

Response: The Monitoring Plan in Chapter 5 of the Grassland Plan includes monitoring before vegetation treatment, and then at 2, 5 and 10 year intervals following the treatment. This is in the Priority 1 category and methods will be based on a variety of techniques.

Letter Number *49 - Curlew DEIS* Comment ID 523

Comment: Columbian Sharp-tailed Grouse - A substantial population of sharp-tailed grouse live within and adjacent to the CNG. As documented in Table 3.7 (compare with Table 3. 1 0), numbers of sharp-tailed grouse counted in spring on leks exceeded the number of male sage grouse counted in 12 of 20 years. Management treatments described in many of the Alterative would benefit sharp-tailed grouse at the expense of sage grouse. Treatments such as planting of tree rows, burning, plowing, reseeding with grasses and forbs would provide benefits to sharp-tailed grouse with little benefit to sage grouse. While any benefits for either species would accrue only over time, the time required for sage grouse to benefit from reseeding would be longer (> I 0- 1 5 years) and would require inclusion of sagebrush in the seed mix unless treated areas were small or linear. Thus, habitat management should focus on sage grouse, as the benefits for sharp-tailed grouse are likely to accrue in the short term, but not in the long term from treatments designed to stabilize or enhance habitats for sage grouse.

Response: Yes. As discussed in the Wildlife Habitat Management section of Chapter 3 in the EIS, sharp-tailed grouse are habitat generalists and adapt to many different habitats. Sage grouse depend on sagebrush habitats for much of the year. Effects on both of these species are detailed in Chapter 4 of the EIS.

Letter Number *49 - Curlew DEIS* Comment ID 514

Comment: Because the DLRMP, in our assessment, inaccurately analyzes how sage grouse populations will be affected by the preferred alternative, the Forest has not adequately or accurately considered how hunting will be effected. It is reasonable to conclude that with the adoption of an alternative unlikely to suspend or reverse declines in sage grouse populations, further sage grouse hunting restrictions will (and should be) imposed by IDFG. Opportunity to harvest sage grouse will decline both as a result of season restrictions and smaller grouse populations. This should be considered as an effect of preferred alternative G. 36 C.F.R. § 219.19(a)(4).

Response: The final EIS includes additional information on sage grouse population trends. Please refer to Wildlife Habitat Management in Chapter 3, Appendix I and Appendix J.

Hunting regulations are outside the scope of this analysis.

Letter Number *49 - Curlew DEIS* Comment ID 516

Comment: The actual number of sage grouse on the Curlew National Grasslands (CNG) or the Greater Curlew Valley Area (GCVA) is unknown. However, the DEIS (3-41) provides data that suggest the breeding population of sage grouse in the CNG was 484 individuals in 2000. This number was derived from a reported number of 134 males counted in 1999 and 154 counted in 2000 on the CNG. The two-year average on the CNG was 144 males counted which was extrapolated to 404 by including females (rate = 1.8 hens/male in the spring population based on the ratio of adult/yearling males and females in the fall harvest). Using these data and assumptions, the total population of sage grouse in the GCVA in spring 2000 was approximately 762 birds (if 134 males counted on the CNG in spring 1999 represented 53% of the 253 male sage grouse counted in the GCVA, the 154 males counted in spring 2000 on the CNG should translate to 291 total males counted in the GCVA plus 524 hens). (Note: the discrepancy between the 484 number and the 404 number is not explained in the DEIS).

The size of the population of sage grouse in the CNG and GCVA in historic times is unknown but was likely much higher. Unfortunately, no data could be located to estimate population levels at 10-year intervals dating to at least 1950. Numbers of sage grouse desired in CNG Resource Management Plan are not specified in any Alternative. However, "wildlife habitat .... managed to maintain viable populations of existing native and desired non-native species" is identified (1-8) as a Desired Future Condition. This number for sage grouse must be higher than the 200 specified in the 1985 Forest Plan (341). Theoretical ecologists suggest a minimum of at least 500 and possibly 5,000 breeding individuals may be necessary to maintain a viable population (Franklin 1980, Soule 1980)

The actual size of the reproductive segment of the spring population is lower than the number extrapolated from counts of males on leks. For example, if only 1 0% of the males actually breed each year (J. R. Young, pers. comm.), the number of males on the CNG that actually breed is < 20 birds. Most, but not all, females may actually lay eggs and nest with the actual number probably close to 90%. Thus, the effective size of the breeding population in the CNG is in the range of 240-260 sage grouse (< 20 males + 234 females). The number of breeding birds calculated in this simplistic model is actually higher that that derived with theoretical models.

There are approximately 47,600 acres of federally managed land within the CNG. The condition of this land varies, as does sagebrush canopy cover, residual grass height, cover of grasses an forbs, etc. Present densities of sage grouse are 5.5 birds per square mile using the number of birds estimated to be present in spring 2000 (47,600 acres divided by 640 acres per square mile = 74 [rounded] divided into 404). Admittedly, not all areas of the CNG are capable of supporting sage grouse and not all sage grouse live entirely on lands managed by the CNG. Properly managed landscapes should be capable of supporting a minimum of IO sage grouse per square mile in spring. Historic data from good sage grouse ranges in Colorado suggest that fall densities of 30 to 50 birds per square mile occurred in 1961 (Rogers 1964:26). This should translate into breeding densities of 15 to 20+ birds per square mile. One can conclude the present condition of the habitat on the Curlew National Grasslands and in the Greater Curlew Valley Area is far below its' potential for sage grouse. Further, with an effective population size of < 260 breeding sage grouse, the persistence of sage grouse on the CNG for 20 to 50 years can be questioned if active habitat management designed to benefit this species is not implemented.

Response: The final EIS includes additional and updated information on sage grouse population trends. Appendix I contains a comprehensive review of all information available at the time of this analysis. Some of this information has also been included in Chapter 3 in the Wildlife Habitat Management section. The final EIS also includes a Biological Evaluation and a Biological Assessment for Alternative H, the selected alternative in the Record of Decision. The BA/BE is found in Appendix J.

Under current law the Idaho Fish & Game Department is responsible for managing huntable wildlife populations while the Forest Service is responsible for maintaining adequate quantity and quality of habitat, in cooperation with State Fish & Game, to meet huntable population objectives. Historically, the Forest Service has relied on population numbers provided by State Fish and Game surveys and monitoring efforts. Population numbers are estimates and while these estimates may not reflect the actual numbers of birds, some reasonable predictions can be made on the trends of a given population.

In reviewing IDFG monitoring information on sage grouse lek attendance, data indicate that based on mean number of male sage grouse per lek, when looking at the long-term trend over 20-30 years, sage grouse populations are on a downward trend over the Greater Curlew Valley Area. Because the CNG comprises only 9% of the GCVA and is broken into 3 distinct units, it is difficult to look at population trends on just the CNG. FS District lek attendance data and field observations suggest that while the mean number of males per lek has declined, the overall

number of leks has increased.

Studies have indicated that loss of adequate quantity and quality of sage grouse habitat is a primary factor in the decline of sage grouse populations along with other factors, such as predation. In addition, current law requires the Forest Service to insure that management activities, such as vegetation treatments, livestock grazing, recreation, or other multiple uses of the land do not contribute or trend toward a listing of any species under the Endangered Species Act.

Letter Number *49 - Curlew DEIS* Comment ID 521

Comment: Utility Corridors - Placement of above ground utility lines/poles can negatively affect sage grouse and has the potential to fragment habitats, cause death of sage grouse, and serve as perches and access trails for potential predators. Policies should be developed to effectively manage placement of above ground utility lines. Narrow, underground pipeline corridors have short-term impacts on sage grouse and proper revegetation can benefit brood habitat.

Response: The EIS discloses that there are about eighteen miles of powerlines currently existing on the Curlew, potentially making sage grouse more vulnerable to predation from raptors. These powerlines serve residents in the Greater Curlew Valley and on the Curlew Grassland. It is not known what effect this is having on vulnerability of sage grouse to predators.

The Grassland Plan states that any new utility lines will be buried.

Letter Number *49 - Curlew DEIS* Comment ID 520

Comment: Roads and Trails - Management of vehicle access and road improvements may be necessary in important sage grouse use areas. Seasonal closures to all vehicles should be considered within winter use sites and near breeding complexes.

Response: Roads are included as potentially causing sage grouse habitat fragmentation in Connelly, et al, (2000). These Guidelines do not include road management guidelines, but generally it is the high speed roads that are considered a problem (J. Connelly, IDFG, personal communication) as they can cause direct mortality and affect movements of sage grouse. None of the Forest Service roads were contructed or are maintained as high speed roads.

The Grassland plan includes guidelines to control disturbance during the breeding season. The Grassland is closed to cross-country motorized use in Alternative H, the selected alternative in the Record of Decision.

Letter Number *49 - Curlew DEIS* Comment ID 519

Comment: Percentage of acres in sagebrush canopy classes is frequently referenced (i.e., Tables 2.7, 2.9, 2.12, 2.15, and 2.18). The new sage grouse habitat guidelines (Table 3 in Connelly et al, 2000) should be adopted when considering managing for specific conditions to enhance breeding, late summer, fall, and winter use areas for sage grouse. In general, provided areas of winter use are known and delineated, more emphasis should be placed on ensuring that residual grass cover is adequate to provide hiding cover for nests placed under sagebrush plants and that forb abundance is at least 15 % of the total vegetative cover. The data presented (3-41) suggest that sage grouse nest success and chick survival are less than desired for population stability and growth on the CNG and in the GCVA. Thus, managing for > 30 % canopy cover is not desired (except in known winter use areas) and most habitats should be in the 10-30 % sagebrush canopy cover class. The 0-5 % sagebrush canopy cover class has little value for sage grouse except in riparian areas. Habitat management emphasis should be placed on providing abundant forbs and taller native grasses within a plant community that has at least 10-1 5 % and preferably 15-30 % live sagebrush canopy cover.

Response: The Draft LRMP includes goals and guidelines for the use of current guidelines (I.e., Connelly, et al, 2000), mapping of functional and degraded breeding and winter habitat, prioritization of treatments in areas with canopy cover >25% and provisions for improvement of understory vegetation (thru seeding and utilization).

We agree that a diversity of sagebrush canopy cover is important. The alternatives address this issue to varying degrees. Treatments proposed in each alternative for the decade would result in various combinations of sagebrush canopy cover at the end of the plan period, depending on the emphasis in each alternative. These range from 6% of the total Grassland acres in 0-5% canopy cover in Alternative D to 29% of the total Grassland acres in 0-5% canopy cover in Altermative A

Letter Number *49 - Curlew DEIS* Comment ID 518

Comment: Several issues are apparent after review of all Alternatives. All except D would favor Columbian sharp-tailed grouse over sage grouse. This is because sharp-tails are disclimax species. Burning of sagebrush and plowing to control bulbous bluegrass has the potential to enhance habitats for sharp-tails. Planting of tree rows also would enhance habitats for sharp-tails. Both of these treatments would be negative for sage grouse. Reseeding with grasses without a majo sagebrush and forb component also favors increased numbers of sharp-tailed grouse. The only treatments that may improve habitats for sage grouse are brush beating, limited use of prescribed fire, and livestock grazing management. Without adequate knowledge of sage grouse winter use areas within the CNG, all treatments have the potential to negatively impact sage grouse. Identification of winter use areas for sage grouse must be an immediate priority for habitat managers and should be completed before any treatments of sagebrush are implemented. The proposed removal of 40-50 % of annual growth of herbaceous forage by domestic livestock (Alternative G) is not conducive to improvement in rangeland vegetation (Holechek et al. 1999). These authors suggest that desired levels of grazing should remove no more than 30-35 % of the available forage for range improvement to occur. If habitat management for sage or sharp-tailed grouse is a priority, annual forage utilization rates by domestic livestock should not exceed 25-30 %.

Response: Utilization of understory species will be managed to maintain nesting habitat and plant vigor. A field review on the Grasslands in 2001 determined that with 50% use on crested wheatgrass, 5 inches of stubble remained, even in a severe drought. Thus, on a normal year it is likely that the 7 inch stubble height recommended for nesting sage grouse by Connelly (2000) will be met. The Holecheck study was conducted in different precipitation zones and on different grass species and should not be extrapolated to the Curlew.

The Grassland Plan includes a goal to develop a habitat map in cooperation with IDFG to identify functional and degraded breeding and winter habitat.

Letter Number *49 - Curlew DEIS* Comment ID 517

Comment: Habitat management strategies identified in the Alternatives differ. Alternatives C and G provide the best possible management of sage grouse habitats although neither is exceptional. Number of acres of sagebrush to be treated is higher in Alternative G with resulting slight differences in amount of area expected to be in each of three sagebrush canopy classes within ten years. Most importantly, all "suitable" areas within 3.2 miles of occupied leks would be protected in Alternative C. Constructing ten additional miles of tree rows over the next ten years in Alternative C would be negative for sage grouse. Burning with subsequent plowing of areas with bulbous bluegrass would be negative for sage grouse under all Alternatives except D. If the tree row treatment was removed from Alternative C and more emphasis was placed on decreasing the percent of the area in the 0-5 % sagebrush canopy cover class and increasing the amount in the 6-15 and > 15 % canopy classes plus enhancement of forbs in treated strips with increased grass residual cover, this Alternative would be best for sage grouse. None of the Alternatives alone is adequate if sage grouse are a priority species for habitat management.

Response: Alternative H, the selected alternative in the Record of Decision, was developed in response to public comments such as yours. In this alternative sagebrush is managed to maintain the existing sagebrush canopy cover over the ten-year Plan period using a combination of light and heavy herbicide applications or mechanical methods to thin sagebrush canopy. These methods will allow better control for creating a mosaic of sagebrush canopy cover classes. Vegetation treatments are prioritized in areas of the Grassland where sagebrush canopy cover is greater than 25 percent. The Grassland Plan provides management guidance to protect active lek with a .25-mile lek buffer during management activities. No additional tree rows are proposed in this alternative. Bulbous bluegrass areas would be treated in this alternative using prescribed fire, plowing and reseeding or other methods, such as using Oust or Plateau, that will achieve resource objectives. Reseeding allows for both native and non-native reseedings based on the site-specific project's goals. This alternative features adaptive management and focused monitoring to help us understand how management activities can be improved to provide for all resource uses.

Letter Number *49 - Curlew DEIS* Comment ID 524

Comment: Hunting By Native Americans - Native Americans have practiced seasonal harvest of wildlife for many years. Spring hunting of sage grouse on or near leks has the potential to be negative for long-term persistence of active leks. Management strategies should include agreements with Native Americans with treaty rights that allow spring hunting so that active sage grouse leks are not negatively impacted.

Response: The 1868 Treaty, signed at Fort Bridger, reserved hunting rights for the Shoshone and Bannock on all unoccupied lands. Court cases have determined that unoccupied lands are any Federal lands, which would include the CNG.

Conversations with people who are active on the Curlew in the spring (D. Meints, IDFG; and K. Timothy, USFS) do not indicate that spring hunting on leks is occuring. Additional conversations with people who work with the Tribes (R. Thompson, USFS Archaeologist and A. Mikkelsen, Shoshone-Bannock Biologist) also feel that this is the case.

If we find evidence in the future that there is spring hunting occuring, we will work with the Tribe to reduce the practice. If unavoidable, efforts will be made to shift the harvest to males only during the early part of the breeding season (this agrees with Connelly, et al, 2000).

Category **Comment Noted**

Letter Number *5 - Curlew DEIS* Comment ID 120

Comment: Blue sagebrush - this is where sage grouse winter. It is an important for sage hens and chicks and they can't live through the winter without it.

Response: Thank you for your comment. The sage grouse life history and habitat requirements are displayed in Chapter 3 of the EIS and is based on the most site specific, current literature available.

Sage grouse habitat requirements have been studied and well documented across the western states, over the last several decades. These studies have overwhelmingly concluded that sage grouse use sagebrush with canopy cover of 15-25%, with understories of perennial grasses an forbs as breeding habitats. In addition, sage grouse use sagebrush stands with canopy cover 1C 30% and heights of 25-35 cm as winter habitat. More information and references are found oin Chapters 3 and 4 of the EIS in the Wildlife Habitat Management sections.

Letter Number *5 - Curlew DEIS* Comment ID 122

Comment: Sage grouse come into alfalfa fields in the summer and move back to blue sagebrush in the fall, where they winter. They don't like June grass, only when it is young and tender, but rattlesnake like June grass too and will eat the chicks.

Response: Thank you for your comment. The sage grouse life history and habitat requirements are displayed in Chapter 3 of the EIS and is based on the most site specific, current literature available.

Sage grouse habitat requirements have been studied and well documented across the western states, over the last several decades. These studies have overwhelmingly concluded that sage grouse use sagebrush with canopy cover of 15-25%, with understories of perennial grasses an forbs as breeding habitats. In addition, sage grouse use sagebrush stands with canopy cover 1C 30% and heights of 25-35 cm as winter habitat. More information and references are found in Chapters 3 and 4 of the EIS under the Wildlife Habitat Management sections.

Letter Number *5 - Curlew DEIS* Comment ID 123

Comment: Pastures are too small - need more room and more water developments to better distribute animals. Recommend strategic placement of water troughs in pastures for better distribution.

Response: Site specific water development and fence locations are outside of the scope of this programmatic planning document. Those specific decisions would be made during the revision of the Allotment Management Plans (AMPs). The AMP revisions will be analyzed in a separate process.

Letter Number *5 - Curlew DEIS* Comment ID 124

Comment: Crows, magpies, skunk, fox, and coyote will eat sage grouse eggs. Predators are the biggest problem for sage grouse. Need to kill coyotes.

Response: Thank you for your comment. The sage grouse life history and habitat requirements are displayed in Chapter 3 of the EIS and is based on the most site specific, current literature available.

Predator control is outside the scope of this analysis. The USDA-APHIS-Wildlife Services has responsibility for predator control.

Category **Riparian Areas**

Letter Number *5 - Curlew DEIS* Comment ID 121

Comment: Use species in riparian areas that cows don't like to rehabilitate areas rather than fence the riparian areas.

Response: The Grassland plan allows for the use of introduced or nonnative species where native species would not meet the objectives of erosion control. Some non-native species, such as reed canary grass, could possibly be used in Grassland riparian areas. These species become relatively unpalatable for livestock consumption when mature. However, there is an inherent danger in using some of these species. Reed canary grass, for example, can completely dominate a site and can be carried down stream and cause problems for downstream irrigators by reestablishing itself in irrigation ditches. Native sedges and other vegetation are already on-site in many areas. By reducing livestock impacts these species should be able to recover relatively quickly and provide the functions needed to stabilize streambanks, filter sediments and so forth. Where there is little or no native vegetation on-site, the use of non-native species may be considered. However, the consequences of using non-native species must be fully investigated prior to seeding.

Category **Alternative G**

Letter Number *51 - Curlew DEIS* Comment ID 273

Comment: Fencing of so called riparian areas is a costly, not effective practice that has been proven time and time again.

Response: The final EIS includes a new alternative, Alternative H, which is the selected alternative in the Record of Decision. This alternative reduces corridor fencing to about five miles on streams that have been assessed as being "at risk" from properly functioning condition to accelerate recovery to PFC status. We believe these are the streams that will benefit most from this kind of management action. In addition, all other perennial streams, not currently fenced in riparian pastures, will be fenced into riparian pastures using existing fences where practical. Livestock utilization in these pastures will be established based on the PFC status of each stream in the pasture.

Fencing, even though there is an up-front construction cost and a maintenance cost, should be an overall benefit to the livestock permittees within the Grassland. Without fencing, intensive monitoring and management of livestock is required to meet the stated goals of riparian areas and stay within utilization and disturbance standards. Intensive monitoring and management is still required within riparian pastures, and once standards are achieved, livestock are moved from the pasture. Monitoring and management workloads are essentially eliminated in those areas where riparian areas are excluded from grazing. This ultimately reduces the required daily work load of the permittee and enhances the riparian and aquatic resources.

In response to comments on the Draft EIS, Alternative H was developed. This alternative proposes less fence construction and creates riparian pastures instead of exclosures while still providing for riparian area improvement.

Category **Comment Noted**

Letter Number *51 - Curlew DEIS* Comment ID 275

Comment: If we all would practice level good thinking management and not respond to small pressure groups who have no vested interest all would benefit and be able to pass a natural resource to our children and grandchildren that would enrich their lives.

Response: Thank you for your comment. NEPA requires that an Agency develop alternatives to the proposed action to address significant issues; socioeconomics was only one of those issues. A of the alternatives will improve and maintain CNG resources and affect people's lives to greater or lesser degrees. The alternatives were analyzed in the EIS and their effects on the resources were displayed.

The decision maker can choose any of the alternatives or a combination of them. Generally the decision maker chooses the alternative which best meets the Purpose and Need. The Record of Decision discloses and explains the reasoning behind his choice of alternatives.

We believe Alternative H, the selected alternative in the Record of Decision, responds to your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring activities.

Letter Number *51 - Curlew DEIS* Comment ID 274

Comment: On-going vegetation treatments to rotate sagebrush to improve the habitat for both wildlife and livestock is one where everyone benefits.

Response: Comment noted.

Letter Number *51 - Curlew DEIS* Comment ID 272

Comment: I am opposed to the proposed management changes proposed. The Curlew Grasslands are in good health now.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, provides a balance between human uses, such as livestock grazing, and wildlife needs in an adaptive framework with focused monitoring to help us better understand how our management activities affect uses and resource conditions.

Category **Economics**

Letter Number *51 - Curlew DEIS* Comment ID 271

Comment: Anyone knows that old growth sage takes all the moisture from the ground and the grasses die. So forage for livestock decreases each year. This means less stocking of livestock and in economic loss to me and the industry. The proposed grazing cut would probably be enough to force me to leave the livestock business as it is hard to find substitute grazing. I have been helping my son start in the ranching business the last two years so both of us would be forced t seek employment elsewhere. Perhaps with the government as they would be responsible for ou loss of employment. So we would be competing for jobs with the same people who were responsible for our change of occupation.

Response: Thank you for your comment. The economic effects of all alternatives are displayed in the FEIS, Chapter 4, Economics effects section.

Category **Wildlife**

Letter Number *51 - Curlew DEIS* Comment ID 270

Comment: Long time management has proven that the stands of old growth sage do not provide any valuable use for livestock or wildlife. The grouse move around from area to area and do not utilize one particular kind of soge or grass more than another. I have watched and hunted them all my life and cannot agree with any of the conclusions of the wildlife biologists. These people do a two-year study and try to make major changes based on flawed data. They need on-going studies that involve many years to develop good data.

Response: We are not managing for "old growth sagebrush, but rather for a distribution of canopy cover classes. Sage grouse habitat requirements have been studied and well documented across the western states, over the last several decades. These studies have overwhelmingly concluded that sage grouse use sagebrush with canopy cover of 15-25%, with understories of perennial grasses and forbs as breeding habitats. In addition, sage grouse use sagebrush stands with canopy cover 10-30% and heights of 25-35 cm as winter habitat.

Alternative H, the selected alternative in the Record of Decision, will manage vegetation to maintain the exisitng sagebrush canopy cover over the ten-year Plan period using a combination of light to heavy herbicides or mechanical methods to thin sagebrush. Vegetation treatments will be prioritized in areas of othe Grassland where sagebrush canopy cover exceeds 25 percent.

Category **Alternatives**

Letter Number *52 - Curlew DEIS* Comment ID 327

Comment: The current management of the Curlew Grasslands addresses the needs of both the wildlife and the grasslands. We have made a concentrated effort to meet the needs of riparian areas by installing and maintaining 9.3 miles of fence since 1995.

Response: The efforts of the permittees within the Grassland to improve riparian and wetland values over the past several years have been considerable. Those affected stream channels and associated riparian areas have shown improvement and should show further improvement with the implementation of new grazing standards within RWAs. There are other, currently unprotected, areas that also need to be improved. The installation of additional fencing will serve to improve these areas as well.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water and air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

Category **Comment Noted**

Letter Number *52 - Curlew DEIS* Comment ID 326

Comment: Some of the data used in the DEIS was prepared by people who have a specific agenda to remove the cattle from the Curlew Grasslands.

Response: Thank you for your comment. We regret that you feel there is significant bias in the EIS. The Interdisciplinary Team is made up of people from various disciplines with many years of professional knowledge and experience. To show our objectivity, we have only drawn conclusions where we have studies, data or site-specific information to substantiate them. Also, we have used many different sources for our information on vegetative conditions, wildlife population trends, etc. instead of relying on only one source. The FEIS contains additional information and current site specific analysis to further substantiate our effects analysis.

In addition, the project record includes comments received from the public through public involvement activities during the planning process and how those comments were used to identify issues. The project record also links together how these public issues and concerns were used to develop the alternatives in the EIS.

We believe Alternative H, the selected alternative in the Record of Decision, responds to your comments by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Letter Number *52 - Curlew DEIS* Comment ID 329

Comment: The current management plan, Alternative A, has been in place for many years and has promoted development of grassland agriculture and sustained yield management of the forage, wildlife, water and recreation. I recommend that alternative A be continued as the management plan for the Curlew Grasslands.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Category **Economics**

Letter Number *52 - Curlew DEIS* Comment ID 324

Comment: Contrary to the DEIS study, Alternative G will have an adverse effect on the economic stability of Oneida County due to loss of revenue.

Response: The economic effects of all alternatives are displayed at the Oneida County level in the FEIS, Chapter 4, Economic and Social Values section. The final EIS includes a revised Economic analysis that incorporates more local information. Appendix B contains a discussion of the methodolgy used in the effects analysis.

Category **Laws & Regulations**

Letter Number *52 - Curlew DEIS* Comment ID 323

Comment: Alternative G does not meet the requirements of the Bankhead Jones Farm Tenant Act of 1937.

Response: Title 3, Section 31 of the Bankhead Jones Farm Tenant Act states, "The Secretary is authorized and directed to develop a program of land conservation and land utilization in order thereby to correct maladjustments in land use and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, developing and protecting recreational facilities, mitigating floods, preventing impariment of dams and reservoirs, developing energy resources, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare, but not to build industrial parks or establish private or commercial enterprises."

Titles I, II and IV were repealed by Congress by the Agricultural Act of 1961. P.L.. 87-128. Title III, though not repealed, has been amended several times since 1937. In the 1960's, the Secretary of Agriculture issued three administrative orders involving the National Grasslands. The 1963 Order was perhaps the most significant since this order amended the management direction in the preceeding two orders. Section 213.1 of the 1963 Order in part states, "The National Grasslands shall be administered under sound and progressive principles of land conservation and multiple use and to promote the development of grassland agriculture and sustained-yield management of the forage, fish and wildlife, timber, water and recreational resources in the areas where the National Grasslands are a part."

The most significant Act affecting the National Grasslands, since the passage of the Bankhead-Jones Farm Tenant Act of 1937, was the enactment of the National Forest Management Act (NFMA) in 1976. Among other things, the Act requires the preparation of management plans for all units of the National Forest System of which National Grasslands are a part. In the early days the focus of National Grasslands was on the value of stabilized watersheds, the productive use of forage by livestock and the relationships of both to rural community stability. Since then, many other values have been added - oil, gas, uranium, and coal; open space vistas; cultural resources; recreation opportunities; wildlife habitat; enjoyment of native plants; threatened and endangered plant and animal species; outdoor laboratories; and solitude.

While the Preamble of the Act states that the primary purpose is to "secure occupancy of farms and farm homes," it is not an operative part of the Statute and does not preempt the direction found in the body of the legislation. Furthermore, the Curlew NG is assisting in securing occupancy of farms by providing low-cost forage for the members of the Curlew and Buist Grazing Associations.

All of the alternatives meet the intent of the BJFTA, especially if we consider the remarks of Congressman Jones, chief sponsor of the Act for the House. He noted that "these lands may be used for any public purpose such as parks, game preserves, recreational centers, forest reserves, or for any other public purpose." Thus, even Alternative D, which eliminates livestock grazing on the CNG, would meet the intent of the BJFTA.

Category **Wildlife**

Letter Number *52 - Curlew DEIS* Comment ID 325

Comment: Alternative G is primarily managing for sage grouse only, it will have a negative effect on other wildlife species.

Response: Effects on sage grouse and other wildlife are discussed in Chapter 4 of the EIS. Appendix J includes the Biological Evaluation and Biological Assessment for Alternative H, the selected alternative in the Record of Decision.

Alternative H was developed in response to public comments on the Draft EIS and Draft Grassland Plan. It proposes to maintain the existing sagebrush canopy cover on the Grassland over the ten-year Plan period using a combination of light and heavy herbicide applications or mechanical methods to thin sagebrush canopy. Vegetation treatments wll be prioritized in areas of the Grassland where sagebrush canopy cover exceeds 25 percent.

Letter Number *52 - Curlew DEIS* Comment ID 328

Comment: Sage grouse counts from Forest Service reports and the Gardner study show that the numbers of birds are at an all time high, and they are cycling as in the past.

Response: This EIS includes additional information on sage grouse population trends. This new information has been incorporated into the effects analysis. Please refer to Wildlife Habitat Management in Chapter 3, Appendix I, and Appendix J.

Category **Comment Noted**

Letter Number *53 - Curlew DEIS* Comment ID 316

Comment: The management that the Curlew Grasslands is currently under addresses the needs of both the wildlife and the grasslands. The alternative plan that is currently in use has been in place for a number of years and has promoted development of grassland agriculture and sustained yield management for the forage, wildlife, water and recreation. Many hours of research and practice have been done to sustain the best possible management practices for this grassland. To change the current management would result in less productivity for sage grouse, sharp-tail grouse, and livestock.

Response: Thank you for your comment. NEPA requires that an Agency develop alternatives to the proposed action to address significant issues, socioeconomics was only one of those issues. A of the alternatives will improve and maintain CNG resources and affect people's lives to greater or lesser degrees. The alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. Generally the decision maker chooses the alternative which best meets the Purpose and Need. The Record of Decision discloses and explains the reasoning behind his choice of alternatives.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.
While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

Letter Number *53 - Curlew DEIS* Comment ID 317

Comment: It bothers me to know that some of the data that was used in the DEIS was prepared by people who have a specific plan to remove cattle from the Curlew Grassland.

Response: Thank you for your comment. We regret that you feel there is significant bias in the EIS. The Interdisciplinary Team is made up of people from various disciplines with many years of professional knowledge and experience. To show our objectivity, we have only drawn conclusions where we have studies, data or site-specific information to substantiate them. Also, we have used many different sources for our information on vegetative conditions, wildlife population trends, etc. instead of relying on only one source. The FEIS contains additional information and current site specific analysis to further substantiate our effects analysis.

In addition, the project record includes comments received from the public through public involvement activities during the planning process and how those comments were used to identify issues. The project record also links together how these public issues and concerns were used to develop the alternatives in the EIS.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Letter Number *53 - Curlew DEIS* Comment ID 319

Comment: I see no reason why alternative A management plan should not be continued for the Curlew Grasslands.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Category **Economics**

Letter Number *53 - Curlew DEIS* Comment ID 315

Comment: As a resident of the Curlew Valley my husband's livelihood depends on the utilization of the cattlemen patronage to the local business within the valley. It concerns me to know that the National Forest Service is proposing a change to Alternative A that could effect the cattlemen in this area that could in turn effect me directly.

Response: These concerns are noted in the analysis and the development of alternatives to achieve the improvements to resource conditions, such as watersheds and sage grouse habitat, while maintaining appropriate traditional uses, such as grazing. The economic effects of multiple uses on the Grassland are shown in the economic analysis in Chapter 4 for the FEIS, Economics section.

Category **Wildlife**

Letter Number *53 - Curlew DEIS* Comment ID 318

Comment: Furthermore, the Idaho Fish and Game's input into this matter fails to produce any data for the statements they have made. It is a given fact that much of what they are saying is information coming out of textbooks rather than actual hands on information.

Response: Sage grouse habitat information described in Chapter 3 in the Wildlife Habitat Section of the EIS and is based on numerous field studies, both on and off of the Curlew National Grassland. Data collected by IDFG includes lek count data which is displayed in Chapter 3, also.

The final EIS includes additional information on sage grouse population trends. Please refer to the Wildlife Habitat Management section of Chapter 3, Appendix I and Appendix J.

Category **Form letter**

Letter Number *54 - Curlew DEIS* Comment ID 320

Comment: This letter is the same comment letter as Letter #53. Please see Letter #53 for response to comments.

Response:

Category **Form letter**

Letter Number *55 - Curlew DEIS* Comment ID 321

Comment: This letter is the same comment letter as Letter #53. Please see Letter #53 for response to comments.

Response:

Category **Form letter**

Letter Number *56 - Curlew DEIS* Comment ID 322

Comment: This letter is the same comment letter as Letter #53. Please see Letter #53 for response to comments.

Response:

Category **Form letter**

Letter Number *57 - Curlew DEIS* Comment ID 335

Comment: Comments in this letter are the same as comments in Letter #52. Please refer to Letter #52 from comments and responses.

Response:

Category **Revised Plan**

Letter Number *6 - Curlew DEIS* Comment ID 202

Comment: I would also like to see sagebrush addressed better on the Caribou. The FS has and will be treating sagebrush to supposedly reduce fuels, yet I see very little mention of sagebrush and its importance to big game and many other animals on FS land. Will the FS feed deer and elk where they have destroyed their winter food supply (sagebrush)?

Response: Sagebrush on the Curlew NG was explicitly addressed in the EIS in each alternative. The Forest Service recognizes the importance of sagebrush habitat to wildlife and domestic animal use. The effect of sagebrush treatments on wildlife and livestock grazing are also addressed in the EIS.

Sagebrush management on the Caribou National Forest outside of the Curlew NG is outside the scope of this programmatic action.

Category **Vegetation**

Letter Number *6 - Curlew DEIS* Comment ID 201

Comment: I am challenging the concept that the fire cycle in sagebrush is 20 to 40 years in the AMS for the Caribou National Forest. This theory is lacking in scientific data and is in conflict with other papers that estimate the fire cycle in sagebrush to be much longer.

Response: Fire cycles vary widely with sagebrush species and environmental conditions. Mountain big sagebrush and basin big sagebrush are the primary big sagebrush species on the Grassland. Winward (1991) and others (Houston, 1971 and Barrett, 1996) suggest that for this big sagebrush type in this area, natural fire return intervals are between 20 and 40 years.

It should be noted that the Curlew NG is a highly altered landscape. More than 66% of the acres have been plowed and farmed for crops or introduced forage producing species. It is not indicative of native shrub-steppe ecosystems.

Fire intervals on the Caribou National Forest outside of the Curlew National Grassland are outside the scope of this programmatic action. Your comments have been directed to the Caribou National Forest, Forest Plan revision team for consideration.

Category **Comment Noted**

Letter Number *60 - Curlew DEIS* Comment ID 269

Comment: Please stay with the management plan that is already in place and has proven to work for both wildlife and humans. 'If it ain't broke, don't fix it."

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Letter Number *60 - Curlew DEIS* Comment ID 266

Comment: What we have now is a predator problem. Before the 1970's the Curlew Valley had no red fox o raccoons and very few skunks, badgers and ravens. If jackrabbits can't make a come back in the Curlew Valley in 20 years, there are too many predators.

Response: There are numerous factors which may be contributing to the decline of sage grouse populations (See Chapter 3, Wildlilfe Habitat Management in the EIS). Hunting seasons and predator control are beyond the scope of this project.

The focus of the Curlew Grassland Plan is management of sagebrush habitats, both through livestock management and vegetation treatments. Sage grouse are an issue and a range of alternatives have been developed to address sage grouse habitats. All alternatives address sage grouse guidelines to varying degrees.

Letter Number *60 - Curlew DEIS* Comment ID 265

Comment: Archie M. Nalder…a resident of Holbrook and a retired employee of SCS…has stated that before the grassland the sage grouse did well in the Curlew when this was all farmed either wheat or summer fallow, "a sage grouse can nest under only one sagebrush at a time."

Response: Thank you for your comment. The sage grouse life history and habitat requirements are displayed in Chapter 3 of the EIS and is based on the most site specific, current literature available.

Sage grouse habitat requirements have been studied and well documented across the western states, over the last several decades. These studies have overwhelmingly concluded that sage grouse use sagebrush with canopy cover of 15-25%, with understories of perennial grasses an forbs as breeding habitats. In addition, sage grouse use sagebrush stands with canopy cover 10 30% and heights of 25-35 cm as winter habitat. More information and references are found in Chapters 3 and 4 of the EIS in the Wildlife Habitat Managemetn sections. Also refer to the new Appendix I, Sage grouse population trends.

Letter Number *60 - Curlew DEIS* Comment ID 264

Comment: I have attended your open house and other public meetings on these proposals and the forest officials have stated that the grasslands are better now than they have ever been. So why change a plan that seems to be working? Demand of the so-called "public" is not always what is best for our environment.

Response: Thank your for your comment. According to NEPA; however, we must develop alternatives to address the significant issues. In addition, the NFMA requires that we maintain viability for wildlife species. Since sage grouse numbers west-wide are declining, the Forest must insure its management is not contributing to a loss of viability. Thus, we must develop alternatives since the current management plan does not address the significant issues. Generally the decision maker chooses the alternative which best meets the Purpose and Need. The Record of Decision discloses and explains the reasoning behind his choice of alternatives.

Alternative A, the No Action alternative, would continue current management that proposes treating approximately 18,000 acres over 10 years using prescribed fire. This alternative would rotate sagebrush areas to achieve a mosaic of 33% of the acres in 0-5% canopy cover, 34% of the acres in 6-15% canopy cover, and 33% of the acres in greater than 15% canopy cover.

It should be understood that only approximately 6,000 acres, not 18,000 acres, of sagebrush have been treated over the last ten to fifteen years due to constraints such as drought, water an air quality concerns, wildlife needs and other emerging issues during this period of time. Of the alternatives proposed in the EIS, Alternative B, the Proposed Action, more nearly reflects actual management that has occurred on the Grassland over the past decade, while incorporating new standards and guidelines, including livestock utilization rates and riparian and wildlife improvements.

While we agree the Grassland is healthier today than it was 30 years ago, new issues and challenges, policy changes, and new state and federal laws and/or court cases, compel us to consider a wide array of information, including public comments, in the development of revised land and resource management plans. Using all of these sources, as well as new scientific research, it is incumbent upon us to insure our planning process uses the best available information in formulating management proposals for the future.

We believe Alternative H, the selected alternative in the Record of Decision, addresses your concerns by balancing human uses, such as livestock grazing, with wildlife needs in an adaptive framework with focused monitoring.

Category **Economics**

Letter Number *60 - Curlew DEIS* Comment ID 268

Comment: The proposed changes in the Draft EIS will undoubtedly create economic hardships to the residents of Curlew Valley and Oneida County.

Response: The economic effects of all alternatives are displayed in the FEIS, Chapter 4, Economics effects section. The scale of the economic impact analysis was Oneida County, which includes much of the Curlew Valley.

Category **Wildlife**

Letter Number *60 - Curlew DEIS* Comment ID 267

Comment: According to recent sage grouse counts by Forest Service and Fish and Game, the numbers have made some improvement over the last three years. The number of pheasants in the valley has also improved. I understand that sage grouse use different habitat than the pheasant, yet both have had struggles in recent years. This suggests to me that it is either predators or maybe weather conditions causing most of the hardships on the game birds. Changing a grazing plan on an already diverse habitat I don't think will have any effect on weather conditions or predator problems.

Response: The final EIS includes updated and additional information on sage grouse population trends in the area. Appendix I contains a comprehensive review of all information available at the time of this analysis. Appendix J includes the Biological Evaluation and Biological Assessment for Alternative H, the selected alternative in the Record of Decision.

Alternative H proposes adaptive management strategies and focused monitoring activities. For example, livestock grazing use would be lighter in areas that are important for sage grouse nesting and brood-rearing and heavier in areas that have predominantly crested wheatgrass in the understory to maintain the plant's vigor over time. Grazing patterns would most likely rotate through pastures from year-to-year. This would result in a portion, if not all, of the Grassland providing adequate sage grouse nesting habitat.

The alternative also proposes to maintain the existing sagebrush canopy cover on the Grassland over the ten-year Plan period using a combination of light and heavy herbicide applications or mechanical treatments to thin sagebrush. Vegetation treatments would be prioritized in areas of the Grassland where sagebrush canopy cover exceeds 25 percent.

Category **Form letter**

Letter Number *62 - Curlew DEIS* Comment ID 336

Comment: Comments in this letter are the same as comments in Letter #52. Please refer to Letter #52 from comments and responses.

Response:

Category **Livestock grazing**

Letter Number *63 - Curlew DEIS* Comment ID 146

Comment: The amendment must examine grazing suitability for the entire Grassland area. Since the existing LRMP was approved, there have been many significant changes in management emphasis and a wealth of significant new information regarding environmental impacts, economics, and alternative uses foregone that require a reanalysis of grazing suitability.

Response: Appendix F in the EIS discusses the criteria and process used to determine the capability and suitability of lands for livestock grazing. The criteria evaluated also are discussed in the Livestock section in Chapter 3. Precipitation is not one of the criteria, but soil is a criteria. Production is also a criteria which is directly affected by precipitation.

All acres on the Grassland met all capability criteria as defined by the Intermountain Region's "Protocol for Rangeland Capability and Suitability Determinations for Forest Plan Revisions" with the exception of a small acreage in the South Huffman field that did not meet the 1.5 mile distance to water criteria. If a water development was located on these acres, all capability criteria would be met. Since the ability to provide water to this location exists, these acres were determined to be capable.

Appendix F also includes a discussion of the criteria and process used to determine livestock suitability. Suitability may change by alternative through the application of management prescriptions. See EIS Chapter 3, Livestock Grazing and Appendix F for a more thorough discussion of capability and suitability.

Category **Revised Plan**

Letter Number *63 - Curlew DEIS* Comment ID 147

Comment: Further, because the DEIS will not be published until late this summer, the grazing suitability analysis, as well as all other aspects of the plan amendment must conform to the new planning regulations. The decision to amend the LRMP and the FEIS prepared…must meet all the requirements of these new planning regulations and be based upon the best scientific information available for maintaining the ecological and economic sustainability.

Response: As of Spring 2001, the new Forest Planning Regulations have been delayed by the Bush administration. The Plan will meet the current requirements at the time of the decision. The relationship of this Plan to current management regulations will be described in detail in the Record of Decision.

Category **Alternatives**

Letter Number *64 - Curlew DEIS* Comment ID 263

Comment: [This comment was relayed through meeting notes taken by Gerald Tower, District Ranger at a meeting with Oneida County Commissioners on December 12, 2000]

Bottom line, they feel we should have been able to develop one or more alternatives that addressed the other resource needs, including grouse, without requiring an adjustment in livestock numbers, as those should be sustainable based on the views attested to by the folks we heard from at last week's evening meeting in Malad.

Response: Alternatives A, B, and E are expected to maintain or increase grazing opportunities over the 10-year planning period. While these alternatives address other resource needs, including grouse, Alternatives C, F, G and H result in reduced impacts on wildlife habitat, watershed, and riparian areas while allowing livestock grazing to continue. Alternative D would discontinue livestock grazing completely.

Based on public comments on the DEIS, the ID Team developed Alternative H, the selected alternative. This alternative would maintain the current percent of acres in each sagebrush canopy over class over the 10-year plan period through a variety of vegetation treatments. Approximately 2,500 acres, where bulbous bluegrass is predominant in the understory, would be treated using prescribed fire, plowing and re-seeding or some other method that would achieve restoration of the herbaceous understory to a more desirable condition. Because of the 5 to 6 year treatment process and the extensive disturbance factor to treat bulbous bluegrass, a 2,500 acres constraint of The remaining 9,600 acres proposed for treatment would be treated to reatin the current number of acres in each of the sagebrush canopy cover classes using herbicide applications. While this alternative would not meet PFC criteria at the end of the ten-year planning period, treatments would maintain existing sagebrush canopy cover and would trend vegetation structure, composition and patterns toward PFC over the long-term. Through adaptive management strategies and focused monitoring activities, we should be better able to understand the effects of management activities and uses on the resources.

In addition, upland utilization levels would be established at 50 percent grassland-wide with further refinement in Allotment Management Plan updates. Corridor fencing would be reduced and applied only on "at risk" streams (approximately 5 miles) that would benefit from fencing. The remaining perennial streams would be fenced into riparian pastures using existing fences where feasible. Riparian livestock utilization would be determined based on the properly functioning condition of the stream. Those streams that are non-functioning would be grazed using light utilization standards, while those streams in properly functioning condition would be grazed at a level that maintains properly functioning condition.

Category **Comment Noted**

Letter Number *64 - Curlew DEIS* Comment ID 262

Comment: [This comment was relayed through meeting notes taken by Gerald Tower, District Ranger at a meeting with Oneida County Commissioners on December 12, 2000]

…expressed concern with the lack of state and local level representation in our IDT process.

Response: The public involvement plan for the Curlew National Grassland Amendment included an outreach to the public, interested stakeholders, state, local, and federal partners. Chapter 6 in the EIS details the public involvement process and contains a list of public contacts. Comments received on the Draft EIS and Draft Plan are displayed in Appendix M. The project record contains all of the letters received from the public regarding the management proposals contained in the EIS.

The Federal Advisory Committee Act prohibts local, non-governmental entities from serving as members on interdisciplinary teams.

Category **Comment Noted**

Letter Number *7 - Curlew DEIS* Comment ID 200

Comment: Hopefully the Fish and Game will have some vision and protect this unique place, and yes I am aware of upper management, who are controlled by politics (money).

Response: Thank you for your comment; however, the Curlew National Grasslands is administered by the Forest Service, not the State Fish and Game Department. All of the alternatives will conserve and restore the CNG to varying degrees.

Letter Number *7 - Curlew DEIS* Comment ID 199

Comment: Why is public land a feed lot for some local cattle rancher?

Response: The Curlew National Grassland is a highly altered landscape where about 36,000 acres have been plowed and seeded over time, in some cases more than once. The Curlew NG is being managed for sustained yield and multiple uses of the resources now and for future generations. Livestock grazing is only one of the multiple uses allowed on the Grassland today. The Curlew Resource Management Plan is being developed, as mandated by the NFMA, to determine programmatic levels of those varying uses.

Category **Vegetation**

Letter Number *8 - Curlew DEIS* Comment ID 534

Comment: In the plan, this statement is made (226): "However, bulbous bluegrass has low value for wildlife habitat and livestock forage." What is the basis of this statement? (I hope it is based on better science than the claim that big sagebrush cover does not naturally exceed 20 percent, as previously discussed.) What species of wildlife in the Curlew National Grassland are being limited by the presence of bulbous bluegrass grass? Is not the removal or reduction of bulbous bluegrass just another excuse for the range or vegetation management folks of the United States Forest Service to continue it's 60 to 70 year old war on big sagebrush?

Response: Bulbous bluegrass starts growth early in the spring, matures ahead of other grasses and is fairly short on the Grasslands. It completes its annual cycle very quickly, thus doesn't provide much forage. Leaves dry up and blow away by August. Since it is an early grower, it often successfu outcompetes native species for spring moisture, thus reducing understory grass and forb diversity. In a field review of the CNG, the IDT measured stubble heights of the understory grasses. Typically, ungrazed bulbous bluegrass leaves were 1-2 inches tall, while ungrazed crested wheatgrass plants were 12-16 inches tall. While bulbous plants average one inch in diameter, crested wheatgrass bunches average 6-8 inches across (Field Notes, 9/01). For the reasons mentioned above, bulbous bluegrass provides little sage grouse cover, even when ungrazed. The bulbils do add to the palatability of dry forage and the starch and fat content make them attractive to rodents and birds, however (Pacific Northwest Extension Publication 467, July 1994). More information on the ecology of bulbous bluegrass is located in the Bulbous Bluegrass Section in Chapter 3 of the EIS.

Letter Number *8 - Curlew DEIS* Comment ID 530

Comment: It appears to me that the work done by Daubenrnire(1970)and Welch (June of 2000) does not support the range management axiom that big sagebrush does not naturally exceed 20 percent cover for basin and mountain big sagebrush and 10 percent cover for Wyoming big sagebrush.

Response: Transect data from the Grassland shows many areas of basin big sagebrush and a subspecies of mountain big sagebrush to be currently in excess of 20 percent canopy cover. A discussion i Chapter 3 under the Sagebrush Canopy Cover subheading shows the Grassland to have 59% o the acres in the greater than 15% sagebrush canopy class. No Wyoming big sagebrush has been identified on the Grassland.

Letter Number *8 - Curlew DEIS* Comment ID 531

Comment: So the supporting evidence that big sagebrush or any sagebrush for that matter increased in cover because of overgrazing is extremely weak, if not, outright nonexistent. This lends credence to the words of Box (2000): "The credibility of range managers is questioned. We are accused of being captive of a single use--livestock grazing."

Response: Big sagebrush areas on the Grassland increase in canopy cover due to the natural rate of succession and fire suppression (Clark and Starkey 1990, Young 1983).

Livestock grazing can speed the rate of succession to dense big sagebrush by decreasing the competitive ability of understory plants (Blaisdell et al. 1982, Burkhardt 1990, Clark and Starkey 1990, Winward 1985, Young 1983). These relationships are more fully detailed and documented in Chapter 3 of the EIS in the Vegetation Cover Type section under the subheading "Disturbances."

We do not suggest that increases in big sagebrush on the Grassland are a result of overgrazing. Treatments proposed in Alternative H, the selected alternative, are designed to maintain the current percentage of acres in the greater than 15 percent canopy cover over the ten-year plan period. The Plan also contains guidance to allow lower use levels on sites with canopy cover in the 16-25% canopy cover class while allowing higher use in pastures that are predominantly crested wheatgrass to retain the vigor of this plant. This alternative emphasizes adaptive management and includes more intensive monitoring to bring deeper understanding regarding how sage grouse and other sagebrush dependent species use the Grassland (See Chapter 5, Monitoring, in the Grassland Plan).

Letter Number *8 - Curlew DEIS* Comment ID 532

Comment: The point is, factors other than big sagebrush cover are involved in determining the amount of bare soil in a given area; such as precipitation, associated or understory species, grazing history and soil properties; three of these are interrelated--precipitation, species and soil properties (Fosbery and leronaka 1964); and do not support the concept that increasing cover of big sagebrush means increasing amounts of bare soil.

Response: Although the effects from grazing play an important role in the condition of the understory of sagebrush ecosystems on the Grassland, sagebrush canopy density also has an influence due to plant competition for light, water, nutrients and space. In the Vegetation Understory section of Chapter 3 of the EIS, herbaceous production in the understory of sagebrush sites with 30 to 40 percent canopy cover is reduced according to some literature (Dr. Alma Winward, 1991). Other literature suggests that herbaceous grass and forb production was significantly higher in treated verses untreated, sagebrush sites (Schumaker et al., 1977). Others suggest that in arid sagebrush-grass steppe ecosystems, "the interplant spaces are characteristically and extensively bare ground." (Wagner, 1998).

The ecology of sagebrush ecosystems has been expanded in Chapter 3 of the EIS.

Letter Number *8 - Curlew DEIS* Comment ID 533

Comment: Another range or vegetation management principal, law, or axiom is that as big sagebrush canopy cover increases, grass cover decreases. Daubenniire(1970)describes a lack of a relationship between big sagebrush coverage and the coverage of perennial grasses (also see table 1). He stated this situation in these words: "One might question whether the stands with more Artemisia also have less of the perennial forage grasses and more of the annuals favored by grazing..... But when the stands are listed in order of the coverage of artemisia (table 3), there is neither positive correlation with the grazing increasers, nor negative correlation with the preferred forage species." R' and r values for his table 3 were 0.0004 and 0.0208, respectfully, c in other words, no relationship existed between big sagebrush coverage and perennial native grasses coverage. Pearson (1965) studying vegetative production in grazed and ungrazed plant communities, found that big sagebrush cover in the ungrazed area was 34% and perennial grasses 4 1 % compared to I I% big sagebrush cover in the grazed area with 22% perennial grass cover. Similarly, Anderson and Holte (1981) reported that for an area in southeastern Idaho protected from grazing for 25 years that big sagebrush cover increased from 15% to 24% with and increase in grass cover from 0.28% to 5.6%. In addition, Lusby (1970) studying grazed and ungrazed watersheds found "marked increase in bare ground soil and rock on all grazed watersheds, accompanied by a decrease in shrub overstory". Another interesting data set comes from the study of Doescher and others (1984) where they selected two types of sites--those having high big sagebrush cover and low grass cover, and those having low big sagebrus cover and high grass cover. The calculated r and R' values were not significant but what was most interesting is that for both types of sites, the study plot with the greatest big sagebrush cover for either site type also contained the greatest grass cover for that site type (26.0% vs. 8.2% and 20% vs. 27.5%).

Response: Although the effects from grazing do play an important role in the condition of the understory of sagebrush ecosystems on the Grassland, sagebrush canopy density also has an influence due to competition for light, water, nutrients and space. In Chapter 3 of the EIS it states that herbaceous production in the understory of sagebrush sites with 30 to 40 percent canopy cover is reduced according to some literature (Dr. Alma Winward, 1991). Other literature suggests that herbaceous grass and forb production was significantly higher in treated verses untreated sagebrush site (Schumaker et al., 1977). Others suggest that in arid sagebrush-grass steppe ecosystems, "the interplant spaces are characteristically and extensively bare ground." (Wagner 1998).

It appears the research studies in your comment were conducted on native sites. The Grassland is a highly altered landscape. More than 66% of the acres have been plowed, and in some cases more than once, and seeded to agricultural crops or introduced non-native species. Your comments are probably more applicable to native sagebrush ecosystems.

Letter Number *8 - Curlew DEIS* Comment ID 527

Comment: It is a principal, law or axiom of range or vegetation management that over grazing caused big sagebrush to increase in cover (McArthur and others 1995). This is best verbalized by Miller and others (1994):

"In the early to mid 1800s much of the sagebrush steppe was probably composed of open stands of shrubs with a strong component of long-lived perennial grasses and forbs in the understory.....Shrub canopy cover probably ranged between 5-10% in the drier Wyoming big sagebrush (Artemisia tridentada ssp. wyomingensis) communities (Cooper 1953, Young et al. 1976, Winward 1991), to 10-20% on the more mesic sites, occupied by mountain big sagebrush (Tisdale et al. 1965, Winward 1991)."

Speaking of the present they noted "Wyoming big sagebrush cover has increased from less than 10% to 20%, and mountain big sagebrush cover from less than 20% to 30 and 40%."

I believe this law or axiom is challengeable on three fronts: first, what do the animals that evolved with big sagebrush tell us concerning cover; second, what are the big sagebrush cover values found in undisturbed relicts such as kipukas; and third what is the quality of the science that is used to support this law of range management?

Numerous studies (see Peterson 1995 for a review) show animals of big sagebrush prefer living in big sagebrush cover far above the levels set by Miller and others (I 994); Baxter (I 996), and Winward (I 99 1). In fact, Rasmussen and Griner (I 93 8) noted that the highest sage grouse nesting success in Strawberry Valley of Central Utah occurred in mountain big sagebrush stands having 50 percent cover. Dr. Bruce L. Welch reported to me that in 1988 he, in the same valley, measured--using the line intercept method--big sagebrush cover of the same magnitude for three different stands of mountain big sagebrush supporting broodless sage grouse hens; nesting habitat, and a male sage grouse loafing area. In addition, Katzner and Parker (1997) reported areas of high pygmy rabbit (Brachylagus idahoenesis) activity occurred in basin big sagebrush stands having 5 1. I percent cover and areas of medium activity occurred in Wyoming big sagebrush stands of 42.7 percent cover. Dobler and Dixon (1990) observed that pygmy rabbits are found only in the denser sagebrush/bitterbrush patches (46%cover), avoiding areas of lower sagebrush density (26-30%).

Thus it appears to me that the range or vegetation management axiom concerning sagebrush cover is based more on myth than law.

Response: The final EIS includes additional information on sagebrush ecology and disturbance factors (See Chapter 3, Vegetation section, Sagebrush Canopy Cover for more information). We agree that livestock grazing, fire suppression and other ecological factors can have an influence on big sagebrush conditions. Big sagebrush areas on the Grassland that have not been treated for the past 20 years show increased canopy cover due to fire suppression and the natural rate of succession. The primary sagebrush species that occur on the Grassland are basin big sagebrush and a subspecies of mountain big sagebrush (Collins and Harper, 1981). No Wyoming big sagebrush has been identified on the Grassland. Current condition of sagebrush cover on the Grassland is documented in Chapter 3 of the EIS.

Letter Number *8 - Curlew DEIS* Comment ID 536

Comment: Bulbous bluegrass plants may coexist with other natives but seldom dominates UNLESS A DISTURBANCE SUCH AS OVERGRAZING OCCURS." Utah State University (I 998:PAGE) reported.

"Bulbous bluegrass is persistent, highly competitive, aggressive, and easily regenerates itself. It spreads rapidly to roadsides, waste places, rocky slopes, and foothills. Often it becomes a dominant species on disturbed areas where it is adapted and may persist as a monoculture. Nevertheless, on many sites it is ultimately replaced by other species or coexists in mixed communities, and thereby adds to biodiversity. Bulbous bluegrass rarely replaces native populations except on abused or otherwise heavily used rangelands."

Response: As described in the EIS, bulbous bluegrass was planted in the 1940's and 1950's on the Grassland in an effort to stabilize the watershed after the Great Dust Bowl (See "Then and Now' pictures in Chapter 3 of the EIS).

Bulbous bluegrass did not gradually invade native stands; it was planted into areas previously plowed and farmed in order to stabilize the soils. This situation on the Grassland is a much different situation than when this species invades disturbed sites where other plant competition i present. Literature shows that this species is not replaced by native species where it has become locally naturalized. This appears to be the case in the Curlew Valley.

The proposed bulbous bluegrass treatments were developed in conjunction with a researcher from the Intermountain Region and will be closely monitored for effectiveness (See Monitoring Chapter in Grassland Plan).

Letter Number *8 - Curlew DEIS* Comment ID 537

Comment: How will treatments aimed at bulbous bluegrass control, which also kills big sagebrush plants, increase the nesting habitat for sage grouse hens? DEIS pages 3-43 & 44, tables 3. 11 & 3.12 indicate grass height was 5.9 inches in the spring of 1999 and 16.1 inches in the fall without grazing. Where these heights from grass plants available for livestock grazing or does the data reflect both grass growing under big sagebrush plants and in the interspaces between big sagebrush plants? Is not grass height related to grass yields? Here grass height or yields have increased without bulbous bluegrass or big sagebrush control but with a reduction of grazing.

Response: Bulbous bluegrass treatments will not increase nesting habitat over the short term. These treatments are designed to remove bulbous bluegrass from the understory and to improve biodiversity and to enhance sage grouse habitat in the long-term. In addition, the grass heights measured are for crested wheatgrass, not predominantly bulbous bluegrass. They are vastly different plants: crested wheatgrass is a tall, robust bunchgrass while bulbous bluegrass is a l growing grass. In a field review of the CNG, the IDT measured stubble heights of the understory grasses. Typically, ungrazed bulbous bluegrass leaves were 1-2 inches tall, while ungrazed crested wheatgrass plants were 12-16 inches tall. While bulbous plants average one inch in diameter, crested wheatgrass bunches average 6-8 inches across. Thus, crested provides muc more wildlife cover and forage as well as better soil protection. For the reasons mentioned above, bulbous bluegrass provides little sage grouse cover, even when ungrazed.

Letter Number *8 - Curlew DEIS* Comment ID 538

Comment: Clearly, higher big sagebrush cover (twice the 15 percent limit of the DEIS for basin and "X" big sagebrush) does not translate into low grass cover and that forces other than fire act to cause dynamic conditions within big sagebrush stands, resulting in the removal of individual plants and the creation of space for new plants.

Response: The EIS does not set a 15 percent limit on basin and "X" big sagebrush canopy cover. Although the effects from grazing do play an important role in the condition of the understory of sagebrush ecosystems on the Grassland, sagebrush canopy density also has an influence due to competition for light, water and space. In Chapter 3 of the EIS it states that herbaceous production in the understory of sagebrush sites with 30 to 40 percent canopy cover is reduced according to some literature (Dr. Alma Winward, 1991). Other literature suggests that herbaceous grass and forb production was significantly higher in treated verses untreated sagebrush site (Schumaker et al., 1977). Others suggest that in arid sagebrush-grass steppe ecosystems, "the interplant spaces are characteristically and extensively bare ground." (Wagner 1998).

Letter Number *8 - Curlew DEIS* Comment ID 540

Comment: The Forest Service considers cheatgrass not to be a problem on the CNG. In the summer of 1999, Section 6 of Township 13 South, Range 31 East, Boise Meridian was dominated by cheatgrass. Any big sagebrush or bulbous bluegrass control methods in this area could increase the spread and abundance of this pest, creating a bigger problem than the presence of bulbous bluegrass…If bulbous bluegrass can keep cheatgrass from dominating a site, then that is a very positive characteristic and would yet be another argument against your plan for the CNG.

Response: Section 6 of Township 13 South, Range 31 East, Boise Meridian is not within the Grassland boundaries. Other than limited areas of cheatgrass found along roads, only one extensive area (approximately 30 acres) of cheatgrass has been identified on the Grasslands (Section 1 of Township 14 South, Range 32 East, Boise Meridian). However, in Chapter 3 of the EIS it states that "some settings appear to be more prone to invasion of annuals, especially cheatgrass, once disturbed. These areas need to be carefully identified prior to project work that may remove perennial cover." Most of these areas have been mapped out in all alternatives using special soil or site features.

We believe that crested wheatgrass outcompetes cheatgrass and is probably one of the reasons cheatgrass has not invaded the Grassland to any large extent.

Letter Number *8 - Curlew DEIS* Comment ID 541

Comment: Better justification is needed for the calculation of grass production under varying degrees of big sagebrush cover in Appendix G-14, 15, 16.

Response: The EIS is clear that any calculation of forage production and the resulting range of potential head months is to be used to compare alternatives only. Estimated forage calculations were never intended to be used to set stocking levels, grazing capacity, season of use or other parameters of livestock grazing management without additional site-specific analysis in allotment management plans.

In order to present a fairly reliable range of estimated forage, four calculations were made for each alternative. One method used an accepted average production in pounds per acre for native, crested wheatgrass, and bulbous bluegrass based on the total number of acres of each type found on the Grassland. This method did not consider a reduction in forage production under sagebrush canopy covers. The ID team then looked at three other calculations - one using District transect data, one using expert advice from the USDA Intermountain Region's Regional Ecologist, and one using a study by Hull and Klomp near Holbrook, Idaho. The result was a range of production capacity and a range of potential head months for each alternative.

Again, the EIS is clear that none of these calculations should be extrapolated to establish stocking levels without further site-specific analysis. They were intended only as a way to compare alternatives based on treatments and utilization levels proposed in each alternative.

We regret you do not think the four methods we used are adequate. The NEPA and court law require us to take a hard look at these issues based on scientific information. We believe we have done this. If you have more information we should use, please provide it. Futhremore, production estimates are used to establish a starting point for livestock numbers. Actual use and capacity will be based on when the utilization levels are met.

Letter Number *8 - Curlew DEIS* Comment ID 542

Comment: Your plan would greatly add to the fragmentation of the big sagebrush ecosystem; an ecosystem that is already highly fragmented. What then would be the benefits of killing big sagebrush under the guise of reducing bulbous bluegrass--an increase of livestock forage for private animals on the people's land? Are there any benefits of this plan for the people's animals on the people's land; none that I can see; if I am wrong, then name the benefits?

Response: Alternative H, the selected alternative, proposes to manage vegetation resources to maintain the existing sagebrush canopy cover. It focuses on improving vegetation conditions in areas where the canopy cover is currently in greater than 25 percent. Alternative H also focuses on improving riparian areas through the use of corridor fencing and riparian pasture management. It allows for adaptive grazing strategies that would graze some pastures with crested wheatgrass at a higher use level, while lighter grazing would occur on native sites, riparian areas, and in areas where canopy cover is between 16-24 percent. This would result in a portion of the Grassland providing residual vegetation to meet wildlife needs while using grazing to maintain the vigor of crested wheatgrass areas. Treatments in areas that have been seeded to bulbous bluegrass are designed to improve understory diversity which benefits wildlife habitat.

Further, one of the goals for vegetation in the Grassland Plan is to "Manage shrub community habitats to reduce fragmentation and maintain or restore connectivity." The Plan contains several standards and guidelines that are designed to help us meet that goal.

Category **Wildlife**

Letter Number *8 - Curlew DEIS* Comment ID 539

Comment: Neither the Draft copy of the plan nor the DEIS address the loss of biodiversity among insects, spiders, etc. when destroying their keystone species - big sagebrush. This is explained in (Welsh) DEIS Lit Cited page 5 - "Other forages on big sagebrush." Have you read this one? Fischer and others (1996) concluded that due to the loss of insects, their "research did not support the contention that fire may enhance sage grouse brood-rearing habitat" or any other kind of big sagebrush control treatments.

Response: Insect populations in sagebrush and other dry shrublands are diverse. On just four sites in Colorado (Haus, et al, 1989), around eighty families of insects were found, as well as other non-insects (mites, scorpions and spiders). Of these, the most abundant include bee flies, leafhoppers, ants, and plant-eating beetles.

Studies of sage grouse foods following prescribed fire found that one of the primary foods, ground-dwelling beetles, were not affected (Pyle and Crawford, 1996). Persistence of June and darkling beetles after shrub removal was associated with maintenance of their food and cover components in the understory.

Another study in Idaho (Fischer, et al, 1996) looked at insects important to sage grouse; Hymenoptera (ants), Coleoptera (beetles) and Orthoptera (grasshoppers). Two to three years following prescribed burning in Wyoming sagebrush they found that Hymenoptera (ants) were nc as abundant in post-burn units. There were no differences in Orthoptera or Coleoptera. (Wyoming sagebrush habitats are not found on the Grasslands, sagebrush on the Grasslands are more mesic and are expected to have different results).

Letter Number *8 - Curlew DEIS* Comment ID 529

Comment: Still, other sagebrush obligates such as sage thrasher (Oreoscoptes montanus), Brewer's sparrow (Spizelia breweri breweri), and sage sparrow (Amphispiza belli) prefer big sagebrush cover of 20 to 40 percent, which is much higher than the maximum allowable by the so called range management axiom '(Best 1972; Braun and others 1976; Feist 1968; Grinnell and others 1930; Knick and Rotenbeny 1995- Medin 1990, 1992; Petersen and Best 1986; Petersen and Best 1991; Reynolds and Trost 1980a; Rich 1980; Winter and Best, 1985). For sagebrush species other than big sagebrush, Walcheck (I 970) reported that a population of Brewer's sparrows were living in an area of silver sagebrush having a canopy cover of 53 percent. Petersen and Best (1987) studying nest site selection of sage sparrows, found that these birds nested where big sagebrush cover was 23 percent in the vicinity of nests and 26 percent in the general study area. Further, they noted that all nests were situated in big sagebrush plants and that large, living shrubs were strongly preferred. Rotenberry (I 980) found greater numbers of sage sparrow and western meadow lark (Stumelia neglects) on sites with big sagebrush canopy covers ranging from 25 to 30 percent, than for sites with big sagebrush canopy cover of 0-1 percent and 5-10 percent.

Response: As discussed in the EIS (See Wildlife Habitat Management section in Chapter 3), the species that you mention are sagebrush obligates, but have not been identified as species-at-risk in the Idaho Bird Conservation Plan (IPIF 2000). Habitat for these species are addressed throught the use of a Management Indicator Species (MIS), the sage grouse. The Grassland Plan includes a guideline that gives higher priority to treatments of sagebrush in the greater than 25% canopy cover class.

Letter Number *8 - Curlew DEIS* Comment ID 528

Comment: Is there historic evidence that pygmy rabbits occurred on the Curlew National Grassland? If so, does the United States Forest Service have any plans to restore them to the grassland? Has the United States Forest Service in the past forty years conducted surveys to determine the presence or absence of pygmy rabbits on the grassland? If so, where is the data stored?

Response: A published distribution map (Groves, et al, 1997) show potential habitat across much of Oneida County. This distribution map was developed through the use of GIS, using county-of-occurrence data from Idaho Conservation Data Center (CDC) and vegetation maps for Idaho.

A recent review by CDC (March 7, 2001) shows records on the western edge of Oneida County (west of the Grasslands) and in the vicinity of Downey (In Bannock County to the east of the Grasslands). There are no known records of pygmy rabbits in the Grasslands, but based on these other records, it is assumed that pygmy rabbits were present at least historically. Much of the Curlew has been heavily modified historically (plowing, farming etc) and it is not known what effect this could have had but fragmentation of habitat historically could be critical to current distribution.

A GIS query was run for the Curlew Grasslands in 12/2000. The predictive model included habitat criteria identified by Gabler, et al, (2000) and Katzner and Parker (1997), and included (1) sagebrush canopy cover 15-25% or canopy cover greater than 25%; and (2) 0-15% slope and (3 aspect of 300-360 or 0-120 degrees. Soils are generally a key criteria; however after discussion with John Lott (Soils Scientist) all soils on the Curlew have the potential to provide habitat.

This query identified seven high priority survey areas, and three lower priority areas. These ten sites are all on the northern end of the Curlew (two on private), while none were identified on the southern-most unit.

To date, only one survey has been done. On 12/21/2000 snow-tracking surveys were done in th Meadow Brook Creek area. Several trails were found; one believed to be jackrabbit, a couple of cottontails, and one that could be pygmy rabbit. However, this was inconclusive because there is quite a bit of overlap between track size, stride and straddle with cottontails. Additional surveys are needed to determine the current status of pygmy rabbits on the Curlew

Letter Number *8 - Curlew DEIS* Comment ID 535

Comment: What species of wildlife will benefit from your planned destruction of bulbous bluegrass and big sagebrush? What is the nature of the science that must be in place to justify this plan? Would not the simple removal of livestock grazing pressure for the six years accomplish the same thing without destroying big sagebrush, the keystone plant species to a whole host of birds, mammals, reptiles, insects, spiders, etc. and save a ton of money? Is not this expenditure of time, resources and money based more on job security and the desire to care for cattle and serve ranchers (Box 2000) than a desire to improve wildlife habitat? Your citation on page lit cited-5 (Utah State University 1998) of the DEIS seem to be of the opinion that resting will replace bulbous bluegrass "by longer-lived perennials in eastern Oregon and Washington, northern and central Idaho, and northern Utah.

Response: Bulbous bluegrass was planted along with crested wheatgrass and other introduced species in the 1940's and 1950's to stabilize the soils. We are now trying to remove the bulbous bluegrass because it has not provided good forage and/or cover. The spread of bulbous bluegrass limits establishment of native species. Our aim in the bulbous treatments is to improve understory plant diversity. In this particular region, we have not seen evidence that reductions in grazing would allow natives to reestablish in these altered locations. The bulbous treatments have been developed in cooperation with research associates and they are experimental. If monitoring determines that the are not effective, we would change the process.

We have been trying to maintain livestock forage resources while maintaining wildlife habitat. The literature indicates that the introduced species are superior to natives at keeping cheatgrass from establishing. Alternative H, the selected alternative in the Record of Decision, balances the needs of many different resources, including livestock grazing through adaptive management strategies and focused monitoring.

Category **Alternative G**

Letter Number *9 - Curlew DEIS* Comment ID 67

Comment: Alternative G should be eliminated as the Preferred Alternative, or if it is not, the restriction that riparian pastures are to be rested 4 years out of 5 years should be eliminated or made much more realistic. In summary:

If riparian pastures are really necessary, graze them every year for a specific, limited amount of time and do not limit the utilization to 30%. A much higher percentage can achieve the desired objectives if time of grazing is short.

Response: The final EIS includes a new alternative, Alternative H, which is the selected alternative in the Record of Decision. This alternative reduces corridor fencing to about five miles on streams that are currently assessed as being "at risk" from properly functioning condition to accelerate recovery to PFC status. We believe these are the streams that will benefit most from corridor fencing. In addition, all other perennial streams, not currently fenced in riparian pastures, will be fenced into riparian pastures using existing fences where practical. Livestock utilization in these pastures will be established based on the PFC status of the stream in the pasture.

Letter Number *9 - Curlew DEIS* Comment ID 68

Comment: I do not understand why the "estimated forage" and potential head months" decline in the first 10 years (Table 4.50, page 4-148). It seems to me that both should increase because of increased grass production due to the 5,000 acres of sagebrush to be treated.

Response: The commenter has not considered succession on untreated acres over the 10-year plan period.

As sagebrush canopy cover increases over time, production in the understory reduces. Alternative G would only treat 5,000 acres in 10 years. Once these 5,000 acres are treated, forage production could increase on these, because the understory would not be competing with sagebrush for water or nutrients; however, over the ten-year plan period succession would mov untreated acres into heavier canopy cover classes, thereby reducing production on those acres.

Utilization rates in Alternative G are proposed at 40-50% for upland vegetation and 30% for riparian pastures. This alternative applies a riparian prescription on approximately 4,000+ acres at a utilization rate of 30%. In addition, sagebrush canopy cover in the greater than 15% canopy cover increases from about 59% of the acres today to about 71% of the acres over the ten year plan period. As canopy cover increases over time, understory vegetation production most generally decreases. As a result, potential head months would be reduced to reflect lower forag production in this alternative.

Category **Comment Noted**

Letter Number *9 - Curlew DEIS* Comment ID 79

Comment: Alternative E should have been chosen as the Preferred Alternative because of the much more reasonable utilization limits and a more reasonable overall management approach. Alternative G should have been one of the alternatives "Considered but Dropped from Analysis and not even included in the DEIS. This still should be done in the final EIS.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them.

Alternative H, the selected alternative in the Record of Decision, was developed from public comments on the Draft EIS. This alternative is a combination of Alternatives F and G. It emphasizes maintaining the existing sage brush canopy cover through thinning applications of herbicides, particularly where sagebrush density is greater than 25 percent.

Letter Number *9 - Curlew DEIS* Comment ID 69

Comment: Your statement on page 4-148: "Adjustments to permitted grazing head months will be addressed through follow-up site-specific grazing allotment management planning" is excellent and this is exactly what should happen.

Response: Comment noted.

Letter Number *9 - Curlew DEIS* Comment ID 78

Comment: It is not at all clear in the DEIS why the much more extreme Alternative G was chosen for the preferred Alternative over the Proposed Alternative B. Only Alternative D is more extreme. I believe that this is a serious mistake on your part without any real justification. In my opinion, Alternative E should have been chosen as the Preferred Alternative.

Response: Thank you for your comment. All of the alternatives were analyzed in the EIS and their effects on the resources were displayed. The decision maker can choose any of the alternatives or a combination of them. The rationale for the decision is found in the Record of Decision.

Category **DEIS**

Letter Number *9 - Curlew DEIS* Comment ID 62

Comment: The definition of utilization that you are using is not in the Glossary.

Response: Thank you for pointing this out; we apologize for the omission. This definition has been included in the glossary for the FEIS. The following definition, from the FSH 2209.21 (May 1993) Rangeland Ecosystem Analysis and Management Handbook will be used: Percent Use (Utilization) is the percentage of current year's forage production that is consumed or destroyed by grazing or browsing animals. May refer to a single species or to the vegetation as a whole.

Letter Number *9 - Curlew DEIS* Comment ID 61

Comment: When an alternative is labeled as "Proposed Action" this means that this is the Alternative that you "propose" to implement. Alternative G is not identified as the "Preferred Alternative" in any of these places in the Table of Contents. This is very confusing to the reader and somehow should have been described and discussed in greater detail and identified in the Table of Contents. Failure to have clarified this very important issue may very well be a violation of the NEPA process and put the entire effort in jeopardy or subject to appeals and challenges in court.

Response: Thank you for the comment. We apologize for the confusion. According to NEPA procedures, the Agency develops a Proposed Action and then forms alternatives to that Action to address significant issues. From the array of alternatives, the Agency then identifies its Preferred Alternative which may or may not be the Proposed Action (FSH 1909.15, 22.3).

Category **Livestock grazing**

Letter Number *9 - Curlew DEIS* Comment ID 63

Comment: Utilization is one tool to achieve some desired condition of the vegetation. When it is put in the context presented in the DEIS, utilization becomes a management objective instead of a tool. If stocking rate adjustments are to be made addressed on a site-specific basis, as indicated … on page 4-148, then the utilization levels should also be determined at that level and not limited or even stated in this DEIS… utilization levels can and should be set higher for any sort of a deferred rotation system than for season-long grazing.

Response: Until a site specific analysis is conducted for both allotments, the Grassland-wide S&G's will be used as a tool to achieve desired ecological conditions.

Utlization levels are a Grassland Plan standard which is used to achieve resource objectives. A use level is not an objective in and of itself. Stocking rate adjustments are made yearly based on those utilization levels. Livestock are moved and removed when use limits are reached on key areas. If the allowable use is determined to be too high or too low to meet Grassland Plan objectives, the Plan can be amended.

Alternative H, the selected alternative in the Record of Decision, allows for variation in livestock use levels based on the type of vegetation and other uses of the area. The guideline in the Grassland Plan calls for higher use on crested wheatgrass stands to maintain plant vigor and lower use levels where residual vegetation is needed for sage grouse nesting and brood-rearing

Letter Number *9 - Curlew DEIS* Comment ID 64

Comment: There is nothing in the literature that indicates that crested wheatgrass should be grazed at 50% or less each year as will be required for Alternative G.

Response: Literature supports the fact that crested wheatgrass can be grazed more than the 50% level prescribed and still provide for the physiological needs of the plant, as you suggest (See Chapter 3, FEIS, Vegetation Cover Types, Disturbance, Crested Wheatgrass section).

The use levels in the Grassland Plan and Alternative H were developed, in part, to address your comments. It contains guidance allowing higher use levels in pastures that are dominated by crested wheatgrass, if needed, to maintain plant vigor.

Letter Number *9 - Curlew DEIS* Comment ID 65

Comment: Use on riparian pastures should not be limited to 30% for most grazing systems. I assume most of your riparian areas have water available for plant growth during much of the grazing season. Thus, for any system that grazes for a period and then removes the livestock, the 30% limit generally is too low because there will be water available for continued plant growth.

Response: If livestock are removed from a riparian area before the end of the plant growing season, grazed riparian plant species will generally continue to grow until the end of the growing season. However, other values within the riparian area need to be considered besides plant growth. Specific stubble heights are needed to catch sediment, protect stream banks and maintain riparian and aquatic values, including wildlife species associated with riparian areas. For these reasons, a 30% utilization rate is reasonable and supported in the literature as meeting the requirements for these other needs.

Letter Number *9 - Curlew DEIS* Comment ID 66

Comment: Fencing half of the riparian areas to exclude livestock grazing except for one in 5 years is not a feasible or desirable option and should be seriously reconsidered…I know of nothing in the riparian literature that supports 4 years of rest for every 1 year of grazing on riparian areas. In fact, based on my experience, resting your riparian areas 4 years out of 5 may very well convert your riparian areas to weed patches dominated by Canadian thistles or other weeds that grazing is now suppressing. Even if it does not go to weeds, the rank riparian growth will make the riparian areas completely unusable by sage grouse broods who use grazed meadows and riparian areas as a source of forbs and insects for food. The rested riparian areas are a bad ide

Response: There is nothing known in the literature that specifically states or suggests a one-in-5-year use in riparian areas. There is also little in the literature to suggest that undesirable plant species (thistles, etc.) will invade and take over riparian areas if left ungrazed. However, the literature strongly supports reduced or limited grazing in riparian areas to protect and enhance riparian and aquatic values. Allowing limited use of fenced riparian areas on a periodic basis will assist in removing old, decadent plant material and help rejuvenate existing plants, maintaining or improving overall riparian health over the long-term.

Letter Number *9 - Curlew DEIS* Comment ID 77

Comment: Completely remove the utiliztion limits for all Alternatives in the entire document and state that these will be determined on a site-specific basis along with determination of stocking rates after objectives for each site have been determined cooperatively by the FS and the permittee(s).

Response: The stated goals in the Grassland Plan are to minimize adverse effects to riparian and aquatic species and to maintain those areas considered to be in "good" condition and restore those areas determined to be in a deteriorated condition (See the CNG Plan). Stubble height, woody species utilization and bank stability are indicators of stated goals and are not ends in themselves. That is, the goal is a healthy system, not a six-inch stubble height. These indicators, supported by literature, provide a starting point for managers. If, through monitoring, it is determined that these indicators are adequate to achieve the desired condition or conditions, then they will remain as standards. If it is determined that they are not adequate to obtain desired conditions, they may be changed, provided sufficient documentation is provided and appropriate administrative procedures are followed.

There are numerous management options that can be implemented to achieve the desired conditions of the stream channels, riparian areas and wetlands. Time-in-pasture, rotation systems, herding, salting, as well as fencing are just a few of these options. Specifying various management techniques at the programmatic Land Management Plan level is inappropriate. These should and will be evaluated and addressed at the Allotment Management Plan and Annual Operating Plan levels on a field-by-field or even pasture-by-pasture basis. Again, a healthy, functional Riparian/Wetland Area is the goal, not a specific stubble height or bank disturbance standard.

Alternative H, the selected alternative, allows for site-specific determinations of utilization levels. See Alternative H description in Chapter 2 of the EIS and livestock grazing standards in the Grassland Plan.

Category **Vegetation**

Letter Number *9 - Curlew DEIS* Comment ID 73

Comment: My discussion with a person familiar with the model indicated that this is a linear model and assumes that a 10% decrease each year would result in a 100% decrease over 10 years. Of course that is not how such a model should work if it were run on a yearly basis and this will be discussed later.

Also the information in Appendix E adds two cover classes, 15-25% and 25+% to replace the 15+% cover class presented in the DEIS. Thus it appears that the VDDT model is not completely compatible with what is presented in the DEIS.

Response: The 15-25 percent canopy cover class and the greater than 25 percent canopy cover class were added together in the EIS representing the greater than 15 percent canopy cover class to simplify the analysis and address sage grouse needs. The model is compatible with what is presented in the EIS.

In an effort to further clarify the uses of the sagebrush canopy cover more explanation is provided in the EIS in Chapter 3 and in the Sagebrush Canopy Cover section of Alternative A in Chapter 4.

Letter Number *9 - Curlew DEIS* Comment ID 71

Comment: On page 4-9 it is stated that: "Treated sagebrush sites on the Grassland in 0-5% canopy cover reach 15% canopy cover in 20 to 30 years." Based on the VDDT model outlined in Appendix E, the 20 year target for succession was used instead of the 30-year target that I consider to be more realistic that would move all of the 0-5% sagebrush to the 6-15% cover class in 10 years. Also 100% of the 6-15% cover class acreage would move to the 5-10% cover in 10 years. I believe that the assumptions in Appendix E are somewhat erroneous.

Response: In Chapter 4 of the EIS it states that "monitoring information from past treatments and information from fire effects (Blaisdell, et al,1982; Bunting, et al,1987) indicate treated sagebrush sites on the Grassland in 0-5 percent canopy cover reach 15 percent canopy cover or greater in 20 to 30 years." Appendix E describes how the VDDT model works and the assumptions the ID Team used in the model.

Approximately ten years is required to achieve the 6-15 percent canopy class from the 0-5 class ten more years is required to achieve sagebrush canopy densities greater than 15 percent in basin and mountain big sagebrush types. An additional ten years or more would be required to achieve canopy cover densities of 25 percent. These assumptions are based on information from site-specific monitoring and scientific literature mentioned above.

Letter Number *9 - Curlew DEIS* Comment ID 76

Comment: What this means is that the PFC figures probably were wrong or, if they are not wrong, at least that the assumption of how these percentages in the PFC were maintained with natural fire need to be presented. Are the long-term goals or the PFC figures presented really accurate and attainable? Statement #10 in Appendix E (page E-8) admits that "long-term outcomes are considered to be not realistic."

Response: Desired Future Conditions for each alternative were developed to meet the theme of the alterntative and to direct management on the Grassland toward meeting the goals and objectives. The VDDT model looked at a 300-year period if treatments proposed in each alternative were not adjusted over time. It is reasonable to think that future land managers may need to address a set of different issues or concerns which could result in adjustments in vegetation management. The statement in Appendix E was made in reference to the model's 300-year projection without adjustment.

PFC figures were derived from the Regional PFC process guide referenced in the Analysis of the Management Situation for the Curlew National Grassland. PFC is accurate based on references and information presented in the EIS but is not expected to be attainable in some alternatives without some increase in treatments in future decades. The theme of Alternative H, the selected alternative, is to maintain the existing sagebrush canopy cover on the Grassland over the Plan period while new monitoring information helps us determine the effects of our management actions on Grassland resources, particularly wildlife species, such as the Columbian sharp-tailed grouse and sage grouse.

Letter Number *9 - Curlew DEIS* Comment ID 75

Comment: Another question - are the long-term goals realistic? Item 10 (page E-8) states that: "long-term outcomes are considered to be not realistic and are not displayed." The figures in the text do project and display long-term outcomes (e.g. Figure 4.29). Why are the long-term outcomes shown when the assumption of the model says that they are not realistic and should not be shown?

It appears that only an original composition of 1/3, 1/3, 1/3 (I.e. 1/3 of the acreage (about 15,000 acres in each cover class), with 1/3 of the greater than 15% cover class (about 5,000 acres) treated every 10 years will maintain a balance over time. No model that has different percentages of area in each of the three cover classes can be treated the same every ten years and maintain those same percentages because of assumed succession.

Response: Long-term goals for each alternative were designed to address the emphais of the alterntative and to direct management on the Grassland toward meeting the goals and objectives for each alternative over a long time. The VDDT model looked at a 300-year period if treatments proposed in each alternative were not adjusted over time. It is reasonable to think that future land managers may need to address a set of different issues or concerns which could result in adjustments in vegetation management. The statement in Appendix E was made in reference to the model's 300-year projection without adjustment.

Your assumption about succession is correct.

Letter Number *9 - Curlew DEIS* Comment ID 74

Comment: It is quite clear that treating 5,000 acres each 10 years will not achieve the long term goals, no matter what succession assumptions are used. It is not stated how much sagebrush will need to be treated in each succeeding 10 years to achieve the long-term goals shown.

Response: This plan is designed for a 10-15 year period. Management goals and objectives may change after this time period so these estimates are not given in the EIS.

Letter Number *9 - Curlew DEIS* Comment ID 72

Comment: [My] projections are somewhat similar (but not identical) to the 10-year predicted totals shown on Figure 4.29. If I have interpreted the model in Appendix E correctly, why are my figures different than what is presented?

Class	My figures	Table 4.29
0-5%	6%	10%
6-10%	22%	19%
>15%	72%	68%

So in spite of treating 5,000 acres of sagebrush during the first 10 years, succession has increased the percentage of the high cover class by 13%, decreased the low (0-5%) cover clas by 11% and decreased the middle cover class (6-15%) by 2%.

Using this model with these assumptions and treating only 5,000 acres each of the succeeding 10-year periods, and the "long-term goal" will never be reached.

Response: The model reduces/increases the acreage in each class by the amount treated each year then adds or subtracts the 10 percent successional growth rate in each class. The 10 percent growth rate is based on the remaining acres in each class at the beginning of each year. The intent of using this model was only to compare alternatives. Other models could be used. Although the figures vary somewhat from your calculations, they are reasonably close enough to compare alternatives. It is understood that in order to achieve the long-term goals in the selected alternative, future treatments would need to be increased after the first decade.

Letter Number *9 - Curlew DEIS* Comment ID 70

Comment: On page 4-138 it says: "The 10-year projected outcome of treatments proposed in this alternative (G) would not achieve the long-term goal for sagebrush canopy cover." I agree that the goal would not be reached in 10 years, but the assumptions about the rate of natural succession are never clearly stated in the body of the DEIS and the long-term goals of the amount in each cover class appear to be erroneous if only 5,000 acres are treated every 10 years.

Response: Natural succession of sagebrush is discussed in Chapter 4 under Alternative A in the Sagebrush Canopy Cover section. Long-term goals are set for 50-100 years. In Alternative H, the selected alternative, additional treatments in subsequent decades would be necessary to achieve the desired future condition of sagebrush canopy cover for this alternative.

Because of other resource needs, sagebrush treatments will focus on areas that are in greater than 25 percent canopy cover.